

Peggy Hunt (Utah State Bar No. 6060)
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Attorneys for Court-Appointed Receiver Peggy Hunt

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff.

v.

TRAFFIC MONSOON, LLC, a Utah Limited
Liability Company, and CHARLES DAVID
SCOVILLE, an individual,

Defendants.

**TENTH INTERIM FEE APPLICATION
FOR RECEIVER AND RECEIVER'S
PROFESSIONALS FOR SERVICES
RENDERED FROM JULY 1, 2020
THROUGH SEPTEMBER 30, 2020**

2:16-cv-00832-JNP

The Honorable Jill N. Parrish

Peggy Hunt, the Court-appointed Receiver (the “Receiver”) of Traffic Monsoon, LLC (“Traffic Monsoon”) and the assets of Charles David Scoville (“Scoville” and, together with Traffic Monsoon, the “Defendants”) that were obtained directly or indirectly from Traffic Monsoon, hereby submits this interim “Fee Application,” seeking approval by the Court of fees and expenses incurred by the Receiver; the Receiver’s counsel, Dorsey & Whitney LLP (“Dorsey”) and Greenberg Traurig, LLP (“Greenberg”); and the Receiver’s accountants,

Berkeley Research Group, LLC (“BRG”), for the period of July 1, 2020 through September 30, 2020 (the “Application Period”) and authorization to pay all allowed fees and expenses from funds of the Receivership Estate. The Receiver respectfully submits that the Application should be approved. In support hereof, the Receiver states as follows.

I. CASE BACKGROUND

1. On July 26, 2016, the above-captioned case was commenced by the United States Securities and Exchange Commission (the “SEC”) against the Defendants, alleging violations of federal securities laws. On that same day, the Court entered a *Temporary Restraining Order and Order Freezing Assets*, which was amended, in relevant part, on July 27, 2016 and on November 4, 2016.¹

Relevant Orders

2. On July 27, 2016, the Court entered an *Order Appointing Receiver* (the “Receivership Order”),² thereby appointing the Receiver and stating in paragraphs 19 and 20 as follows:

19. The Receiver is authorized to employ professionals to assist her in carrying out the duties and responsibilities described in this Order. The Receiver shall not engage any professionals without first obtaining an Order of the Court authorizing such engagement. The Receiver is authorized to retain Dorsey & Whitney LLP, a firm in which the Receiver is a partner, as the Receiver’s counsel in this matter.

20. The Receiver and Retained Professionals are entitled to reasonable compensation and expense reimbursement from the receivership estate as described in the “Billing Instructions for Receivers in Civil Actions commenced by the U.S. Securities and Exchange Commission (the “Billing Instructions”) agreed to by the Receiver. Such compensation shall require the prior approval of the Court.

¹ Docket Nos. [8](#), [14](#) & [56](#).

² Docket No. [11](#).

3. The Court thereafter entered an *Order Granting Receiver's Ex Parte Motion Seeking Authorization to Employ Accountants*,³ authorizing the Receiver's employment of BRG effective as of September 2, 2016.

4. On March 28, 2017, the Court entered, among other things, a *Preliminary Injunction*⁴ and an *Amended Order Appointing Receiver* (the "Amended Receivership Order").⁵ The Amended Receivership Order restates, without making substantive changes to, paragraphs 19 and 20 of the Receivership Order quoted in ¶ 2 above.⁶

5. On June 13, 2017, the Court entered an *Order Establishing Administrative Expense Payment Procedures* (the "Fee Procedures Order"),⁷ setting forth procedures for the request and payment of professional fees and expenses in this case. This Fee Application is an "Interim Fee Application" within the meaning of ¶ 10 of the Fee Procedures Order and is intended to meet the criteria of ¶¶ 11 through 15 of that Order.

6. On February 16, 2018, the Court entered a *Second Amended Order Appointing Receiver* (the "Second Amended Order"), which did not affect billing and fee allowance procedures as set forth in the above-mentioned Orders, except that paragraph 5 of the Order requires that the Receiver "obtain prior approval from this court before using Receivership Assets to present arguments on the merits of the [SEC's] claims against Traffic Monsoon and

³ Docket No. [25](#).

⁴ Docket No. [79](#).

⁵ Docket No. [81](#).

⁶ *Id.* (Amended Receivership Order ¶¶ [17-18](#)).

⁷ Docket No. [101](#).

Scoville in the above captioned action . . . or in any appeals from orders or judgments of this court.”⁸

7. The Court entered an *Order Conditionally Granting Receiver’s Ex Parte Motion Seeking Authorization to (1) Employ Greenberg Traurig, LLP, as Receiver’s Counsel and (2) to Retain Dorsey & Whitney LLP as Special Counsel on a Limited Matter*,⁹ authorizing the Receiver’s employment of Greenberg effective as of May 7, 2020 (the “2020 Employment Order”).

8. As set forth in Greenberg’s invoices attached hereto, Greenberg has applied billing rates consistent with the 2020 Employment Order. Additionally, during the Application Period, Dorsey continued to provide limited services to the Receivership Estate. The Receiver anticipates that Dorsey’s services are completed, and it will no longer be engaged in this case going forward.

Notices of Requests for Payment

9. During the Application Period, the Receiver filed three *Notices of Request for Payment* pursuant ¶¶ 1-5 of the Fee Procedures Order, seeking payment of fees and reimbursement of costs for the months of July, August, and September 2020 (the “Monthly Requests”).¹⁰

⁸ Docket No. [120](#).

⁹ Docket No. [258](#).

¹⁰ Docket Nos. [272](#), [273](#), & [278](#)

10. No objections to the Monthly Requests were filed and, accordingly, pursuant to ¶ 8 of the Fee Procedures Order, the Receiver paid 80% of the fees requested therein and reimbursed all out-of-pocket expenses.

11. A summary of payments made to the Receiver and each of the Professionals pursuant to the Monthly Requests is included in **Exhibit 1**.

Relevant Status Report

12. On December 9, 2020, the Receiver filed her *Tenth Status Report* (the “Status Report”).¹¹ The Status Report outlines the work done by the Receiver and her professionals during the current Application Period and is incorporated herein by reference.

II. FEES AND EXPENSES REQUESTED ARE ACTUAL, NECESSARY AND REASONABLE FOR THE SERVICES RENDERED

13. During the Application Period, significant professional services were required to perform the work outlined in the Status Report incorporated herein.

14. The Receiver and her professionals have provided actual and necessary services related to the matters summarized in the Status Report and detailed in the Exhibits attached hereto for the benefit of the Receivership Estate. Out-of-pocket expenses were also incurred by the professionals in rendering services to the Receivership Estate.

15. Greenberg, Dorsey, and BRG have submitted their invoices to the Receiver. The Receiver reviewed the invoices and, when necessary, requested adjustments to the fees or expenses requested. The Receiver also reviewed her time records and adjustments were made

¹¹ Docket No. [279](#).

when necessary. The invoices included in the Monthly Requests are the invoices that have been approved by the Receiver and the Receiver knows of no dispute related to the requests made.

16. The Fee Application complies with the SEC's Billing Instructions. In accordance with ¶ 12 of the Fee Procedures Order and the SEC Billing Instructions, the Receiver submitted this Fee Application to the SEC prior to filing it with the Court, and the SEC has informed the Receiver that it has no objection to the payment of the fees or reimbursement of the expenses outlined herein.

17. With any adjustments made, the Receiver believes that the fees and expenses are reasonable, especially in light of the work that has been done during the Application Period as outlined in the Status Report. She also believes that the services rendered and the expenses advanced have been beneficial to the Receivership Estate.

III. SUMMARY OF EXHIBITS

18. Professional services have been recorded contemporaneously with services being rendered and these services, as well as the expenses incurred, are detailed in the attached Exhibits described below.

19. The Receiver and her professionals have billed their time according to topical tasks noted in their respective invoices, and time is billed chronologically based on task.

20. The following Exhibits are attached hereto in support of this Fee Application:

Exhibit 1¹²

Exhibit 1-A	Receiver Summary of Fees and Expenses for the Application Period
Exhibit 1-B	Dorsey Summary of Fees and Expenses for the Application Period
Exhibit 1-C	Greenberg Summary of Fees and Expenses for the Application Period
Exhibit 1-D	BRG Summary of Fees and Expenses for the Application Period

Exhibit 2

Monthly Request for July 1 through July 31, 2020¹³

Exhibit 3

Monthly Request for August 1 through August 31, 2020¹⁴

Exhibit 4

Monthly Request for September 1 through September 30, 2020¹⁵

IV. SUMMARY OF AMOUNTS REQUESTED

21. The Receiver is requesting allowance of all fees and out-of-pocket expenses discussed below. Although allowance is sought of all fees and expenses, the Receiver will pay only those sums outstanding as set forth below because a portion of the fees and expenses have

¹² Each of the *Summaries* in Exhibit 1 include, among other things, a total of the fees and costs requested, with a cross reference to the Exhibits referenced below containing the professional's contemporaneous time records for such fees and costs.

¹³ Docket No. [272](#).

¹⁴ Docket No. [273](#).

¹⁵ Docket No. [278](#).

already been paid as requested in the unopposed Monthly Requests and as authorized by the Fee Procedures Order.

22. The Receivership Estate has sufficient funds to pay all amounts requested.¹⁶

Receiver

23. From July 1, 2020 through the end of the Application Period on September 30, 2020, the Receiver has worked a total of 50.5 hours providing receivership services to the Receivership Estate for which fees in the total amount of \$16,281.90 have been incurred after reductions.¹⁷

24. Of that amount, \$13,025.52 has already been paid pursuant to the unopposed Monthly Requests and, therefore, a total of \$3,256.38 remains outstanding.¹⁸

25. The amount requested includes reductions made by the Receiver in an exercise of her billing judgment and/or at the request of SEC. The Receiver has reduced her fees in the total amount of \$1,670.85 for the Application Period.¹⁹

Dorsey

26. From July 1, 2020 through the July 31, 2020, Dorsey worked a total of 1.0 hours and provided legal services to the Receivership Estate for which fees in the total amount of \$570.50 and out-of-pocket expenses in the total amount of \$1,343.06 have been incurred.²⁰

¹⁶ See Docket No. [279](#) (Status Report & Exh. 1 (SFAR)).

¹⁷ See Exhs. 1-A, 2-A, 3-A, and 4-A.

¹⁸ See Exh. 1-A.

¹⁹ See Exh. 1-A.

²⁰ See Exhs. 1-B and 2-B.

27. Of that amount, \$1,799.46 has already been paid pursuant to the unopposed Monthly Requests and, therefore, a total of \$114.10 remains outstanding.²¹

Greenberg

28. From July 1, 2020 through the end of the Application Period on September 30, 2020, Greenberg worked a total of 148.2 hours and provided legal services to the Receivership Estate for which fees in the total amount of \$99,656.00 and out-of-pocket expenses in the total amount of \$166.30 have been incurred after reductions.²²

29. Of that amount, \$79,891.10 has already been paid pursuant to the unopposed Monthly Requests and, therefore, a total of \$19,931.20 remains outstanding.²³

30. The amount requested includes reductions made by Greenberg in an exercise of its billing judgment and/or at the request of the Receiver or the SEC. Greenberg has reduced its fees in the total amount of \$9,300.00 for the Application Period.²⁴ Not reflected in these reductions is the fact that the rates applied are far below the relevant attorneys' actual Salt Lake City, Utah market rates and do not account for their years of experience or their specialized knowledge of matters related to this case.

BRG

31. From July 1, 2020 through the end of the Application Period on September 30, 2020, BRG worked a total of 100.8 hours providing forensic and general accounting services to

²¹ See Exh. 1-B.

²² See Exhs. 1-C, 2-C, 3-B, and 4-B.

²³ See Exh. 1-C.

²⁴ See Exh. 1-C.

the Receivership Estate for which fees in the total amount of \$28,273.50 and out-of-pocket expenses in the total amount of \$232.69 have been incurred after reductions.²⁵

32. Of that amount, \$22,851.49 has already been paid pursuant to the unopposed Monthly Requests and, therefore, a total of \$5,654.70 remains outstanding.²⁶

33. The amount requested includes reductions made by BRG in an exercise of its billing judgment and/or at the request of the Receiver or the SEC. BRG has reduced its fees in the total amount of \$2,052.00 for the Application Period.²⁷

V. PRIOR APPLICATIONS AND INTERIM NATURE OF REQUEST

34. This is the tenth Fee Application of the Receiver and her professionals.

35. The Court has previously entered *Orders* authorizing the Receiver's Interim Applications for the periods of July 27, 2016 through June 30, 2020.²⁸

36. The Receiver and her professionals understand that authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and fee application.

VI. REQUEST FOR COURT APPROVAL

37. For the reasons set forth above and as supported by the Exhibits attached hereto, the Receiver respectfully submits that the fees and expenses requested herein are for actual

²⁵ See Exhs. 1-D, 2-D, 3-C, and 4-C.

²⁶ See Exh. 1-D.

²⁷ See Exh. 1-D.

²⁸ Docket Nos. [100](#), [107](#), [119](#), [163](#), [164](#), [209](#), [246](#), [276](#).

services that were necessary for and beneficial to the administration of the Receivership Estate. The Receiver has made every attempt to contain the administrative expenses of this Receivership Estate, and she submits that given the work that has been performed as outlined in her Status Report, the fees and expenses of all professionals that have been incurred are reasonable.

38. Thus, the Receiver respectfully submits this Fee Application and requests that the Court enter an Order allowing the fees and expenses requested herein. She also requests that the Court authorize her to pay allowed fees and expenses from funds of the Receivership Estate to the extent those fees and expenses have not been paid to date in accordance with the Fee Procedures Order.

Dated this 10th day of December, 2020.

[SIGNATURE PAGE FOLLOWS]

RECEIVER

/s/ Peggy Hunt
Peggy Hunt
Receiver, Peggy Hunt

DORSEY & WHITNEY LLP

/s/ Steven Marsden
Milo Steven Marsden
Counsel for Receiver

GREENBERG TRAURIG, LLP

/s/ Sarah Goldberg
Sarah Goldberg
Counsel for Receiver

BERKELEY RESEARCH GROUP

/s/ Marvin Tenenbaum
Marvin Tenenbaum
*Senior Vice President & Special Advisor to
the Chairman*

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December, 2020, I caused the foregoing **TENTH INTERIM FEE APPLICATION FOR RECEIVER AND RECEIVER'S PROFESSIONALS FOR SERVICES RENDERED FROM JULY 1, 2020 THROUGH SEPTEMBER 30, 2020** to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of the filing to all counsel of record in this case.

/s/ Candy Long

EXHIBIT 1-A

TRAFFIC MONSOON**Summary of Peggy Hunt - Receiver Fees & Expenses****July 1, 2020 - September 30, 2020**

Date	Invoice No.	Hours	Fees	Voluntary		Adjusted Fees	Expenses	Amount		Exhibit
				Reduction				Amount Paid	Outstanding	
Jul-20	5483224	24.1	\$ 8,567.55	\$ (675.45)		\$ 7,892.10	\$ -	\$ 6,313.68	\$ 1,578.42	2-A
Aug-20	5483243	11.7	4,159.35	(142.20)		4,017.15	-	3,213.72	803.43	3-A
Sep-20	5512589	14.7	5,225.85	(853.20)		4,372.65	-	3,498.12	874.53	4-A
Total		50.5	\$ 17,952.75	\$ (1,670.85)		\$ 16,281.90	\$ -	\$ 13,025.52	\$ 3,256.38	

EXHIBIT 1-B

TRAFFIC MONSOON

Summary of Dorsey & Whitney Fees & Expenses
July 1, 2020 - September 30, 2020

Date	Invoice No.	Hours	Fees	Voluntary Reduction	Adjusted Fees	Expenses	Amount Paid	Amount Outstanding	Exhibit
Jul-20	201041913 201042016	1.0	\$ 570.50	\$ -	\$ 570.50	\$ 1,343.06	\$ 1,799.46	\$ 114.10	2-B
Total		1.0	\$ 570.50	\$ -	\$ 570.50	\$ 1,343.06	\$ 1,799.46	\$ 114.10	

EXHIBIT 1-C

TRAFFIC MONSOON**Summary of Greenberg Traurig Fees & Expenses****July 1, 2020 - September 30, 2020**

Date	Invoice No.	Hours	Fees	Voluntary			Expenses	Amount		Exhibit
				Reduction	Adjusted Fees			Amount Paid	Outstanding	
Jul-20	5483244	19.4	\$ 61,534.50	\$ (5,010.00)	\$ 56,524.50	\$ 21.27	\$ 45,240.87	\$ 11,304.90	2-C	
Aug-20	5435104	99.3	36,611.50	(2,277.00)	34,334.50	-	27,467.60	6,866.90	3-B	
Sep-20	5515788	29.5	10,810.00	(2,013.00)	8,797.00	145.03	7,182.63	1,759.40	4-B	
Total		148.2	\$ 108,956.00	\$ (9,300.00)	\$ 99,656.00	\$ 166.30	\$ 79,891.10	\$ 19,931.20		

EXHIBIT 1-D

TRAFFIC MONSOON**Summary of BRG Fees & Expenses****July 1, 2020 - September 30, 2020**

Date	Invoice No.	Hours	Fees	Voluntary		Adjusted Fees	Expenses	Amount		Exhibit
				Reduction				Amount Paid	Outstanding	
Jul-20	102435	41.3	\$ 12,618.00	\$ (313.50)		\$ 12,304.50	\$ 132.19	\$ 9,975.79	\$ 2,460.90	2-D
Aug-20	102436	46.8	14,061.00	(142.50)		13,918.50	50.50	11,185.30	2,783.70	3-C
Sep-20	104007	12.7	3,646.50	(1,596.00)		2,050.50	50.00	1,690.40	410.10	4-C
Total		100.8	\$ 30,325.50	\$ (2,052.00)		\$ 28,273.50	\$ 232.69	\$ 22,851.49	\$ 5,654.70	

EXHIBIT 2

Peggy Hunt (Utah #6060)
Sarah Goldberg (Utah #13222)
John J. Wiest (Utah #15767)
GREENBERG TRAUIG, LLP
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wiestj@gtlaw.com

Attorneys for Court-Appointed Receiver Peggy Hunt

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

TRAFFIC MONSOON, LLC, a Utah limited
liability company, and CHARLES DAVID
SCOVILLE, an individual,

Defendants.

**NOTICE OF REQUEST FOR PAYMENT
BY RECEIVER AND RECEIVER'S
PROFESSIONALS**

**(JULY 1, 2020, THROUGH
JULY 31, 2020)**

2:16-cv-00832-JNP

The Honorable Jill N. Parrish

Pursuant to the *Order Establishing Administrative Expense Payment Procedures* entered by the Court on June 13, 2017,¹ Peggy Hunt, the Court-appointed receiver in the above-captioned case (the “Receiver”), hereby submits the following *Notice of Request for Payment by Receiver and Receiver’s Professionals* related to fees and expenses incurred during the period of July 1, 2020, through July 31, 2020 (the “Notice”). The fees and expenses detailed in this Notice

¹ Docket No. [101](#).

have been reviewed and approved, subject to Court approval, by the Receiver. This Notice was served on the Securities and Exchange Commission on October 6, 2020, and the Commission has informed the Receiver it does not oppose this request.

<u>Name of Applicant</u>	Receiver
Total Hours of Service	24.10
Total Fees for Time Period	\$ 7,892.10²
Total Expenses for Time Period	\$ 0.00
Total	\$ 7,892.10
Total Interim Payment Requested: (80% of Fees and 100% of Expenses)	\$ 6,313.68
Remaining Balance:	\$ 1,578.42
Time and Services Detail:	Exhibit A

<u>Name of Applicant</u>	Dorsey & Whitney LLP
Total Hours of Service	1.00
Total Fees for Time Period	\$ 570.50
Total Expenses for Time Period	\$ 1,343.06³
Total	\$ 1,913.56
Total Interim Payment Requested: (80% of Fees and 100% of Expenses)	\$ 1,799.46
Remaining Balance:	\$ 114.10

² Incurred fees totaling \$8,567.55, less a voluntary reduction of fees in the amount of \$675.45.

³ One of Dorsey's expenses in July 2020 was for £1,000 GBP. Based on the Receiver's review of the rates, on July 31, 2020, the conversion rate was on average 1 GBP = 1.312 USD. Accordingly, the Receiver is seeking authority to make a payment in the amount of \$1,312.00 for this expense. The other expense was for a filing fee in a United Kingdom court for \$31.06. Dorsey has completed services, and this should be its last invoice.

Time and Services Detail:

Exhibit B

Name of Applicant

Greenberg Traurig, LLP

Total Hours of Service **129.90**

Total Fees for Time Period **\$ 56,524.50⁴**

Total Expenses for Time Period **\$ 21.27**

Total **\$ 56,545.77**

Total Interim Payment Requested: **\$ 45,240.87**
(80% of Fees and 100% of Expenses)

Remaining Balance: **\$ 11,304.90**

Time and Services Detail:

Exhibit C

Name of Applicant

Berkeley Research Group

Total Hours of Service **41.30**

Total Fees for Time Period **\$ 12,304.50⁵**

Total Expenses for Time Period **\$ 132.19**

Total **\$ 12,436.69**

Total Interim Payment Requested: **\$ 9,975.79**
(80% of Fees and 100% of Expenses)

Remaining Balance: **\$ 2,460.90**

Time and Services Detail:

Exhibit D

[Signature Page Follows]

⁴ Incurred fees totaling \$61,534.50, less a voluntary reduction of fees in the amount of \$5,010.00.

⁵ Incurred fees totaling \$12,618.00, less a voluntary reduction of fees in the amount of \$313.50.

DATED October 12, 2020.

RECEIVER

/s/ Peggy Hunt

Peggy Hunt

DORSEY & WHITNEY LLP

/s/ Steven Marsden

Milo Steven Marsden
Counsel for Receiver

GREENBERG TRAURIG, LLP

/s/ Sarah Goldberg

Sarah Goldberg
Counsel for Receiver

BERKELEY RESEARCH GROUP

/s/ Marvin Tenenbaum

Marvin Tenenbaum
Senior Vice President & Special Advisor to
the Chairman
Accountants for Receiver

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record in this case.

/s/ Carson Heninger

I further certify that on October 12, 2020, I caused the foregoing to be served as follows:

Via Email:

The SEC
Daniel J. Wadley
Amy J. Oliver
Cheryl M. Mori
waldleyd@sec.gov
olivera@sec.gov
moric@sec.gov

BRG
Matt K. Babcock
Jeff Shaw
Ray Strong
mbabcock@thinkbrg.com
JShaw@thinkbrg.com
rstrong@thinkbrg.com

Via U.S. Mail, First Class, postage pre-paid:

Traffic Monsoon
c/o Charles Scoville
JUAB COUNTY JAIL
PO BOX 133
NEPHI, UT 84648

Charles David Scoville
JUAB COUNTY JAIL
PO BOX 133
NEPHI, UT 84648

/s/ Candy Long

EXHIBIT A

Peggy Hunt- Receiver for Traffic Monsoon/Receiver Services
Services Rendered July 1, 2020 to July 30, 2020

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	6.20	\$ 2,204.10		\$ 2,204.10
TMLS-TMLS002	Asset Recovery	14.4	5,119.20	-	\$ 5,119.20
TMLS-TMLS003	Claims Administration	1.6	568.80	-	\$ 568.80
TMLS-TMLS004	Fee Issues	1.9	\$ 675.45	(675.45)	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -		\$ -
TMLS-TMLS006	International	0.0			\$ -
	Total Fees	24.10	\$ 8,567.55	\$ (675.45)	\$ 7,892.10
TMLS-TMLS007	Out-of-Pocket Expenses		-		\$ -
	Invoice Total				\$ 7,892.10



Invoice No. : 5483224
File No. : 194098.010100
Bill Date : August 4, 2020

Peggy Hunt
222 S. Main Street, 5th Floor
Salt Lake City, UT 84101

INVOICE

Re: Receiver for Traffic Monsoon / Receiver Services

Legal Services through July 31, 2020:

	\$	8,567.55
Less Courtesy Discount:	\$	(675.45)
Total Fees:	\$	7,892.10

Current Invoice:	\$	7,892.10
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Invoice No.: 5483224
 Matter No.: 194098.010100

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Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/20	Peggy Hunt	Investor communications; correspondence with M. Blower re status of investigation on Aslam; correspondence with S. Goldberg and J. Wiest re tasks	0.40	142.20
07/06/20	Peggy Hunt	Investor communications, and attend to administrative tasks	0.50	177.75
07/07/20	Peggy Hunt	Call with US Attorney re case	0.50	177.75
07/08/20	Peggy Hunt	Correspondence with R. Cheetham and J. Wiest re tasks	0.30	106.65
07/09/20	Peggy Hunt	Review tax returns, correspondence with V. Calder re same and execute same	0.30	106.65
07/10/20	Peggy Hunt	Attend to numerous case administration issues	1.00	355.50
07/13/20	Peggy Hunt	Attend to administrative issues on FTI and Cost analysis issues	0.10	35.55
07/14/20	Peggy Hunt	Numerous correspondence with FTI re invoices and conferences and correspondence with bank (.4); meeting with J. Shaw re taxes and numerous accounting issues and follow up (.4); meeting with S. Goldberg and J. Wiest re tasks (.2); conference with A. Oliver and follow up correspondence (.5)	1.30	462.15
07/16/20	Peggy Hunt	Team status meeting re updates and tasks (.8)	0.80	284.40
07/17/20	Peggy Hunt	Investor communications and correspondence re tasks	0.10	35.55
07/22/20	Peggy Hunt	Attend to administrative issues, including bank interest rates	0.30	106.65
07/27/20	Peggy Hunt	Attend to investor communication issues and directions on several tasks	0.20	71.10
07/28/20	Peggy Hunt	Correspondence with I. Bean re UK representation issues; investor communications; attend to banking issues	0.30	106.65
07/30/20	Peggy Hunt	Correspondence with S. Oufnac re coordination E. Ganz	0.10	35.55

Total Hours: 6.20

Total Amount: \$ 2,204.10

Total Fees: 2,204.10

Invoice No.: 5483224
 Matter No.: 194098.010100

Page 2

Description of Professional Services Rendered

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/20	Peggy Hunt	Correspondence with UK associates re tasks (.1)	0.10	35.55
07/08/20	Peggy Hunt	Call with J. Wiest re UK recovery issues and follow up on same (.5)	0.50	177.75
07/13/20	Peggy Hunt	Conference with UK partners and J. Wiest and follow up call with J. Wiest re tasks	1.50	533.25
07/15/20	Peggy Hunt	Review correspondence on Aslam bankruptcy matters; analysis of same; and correspondence with J. Wiest	0.40	142.20
07/20/20	Peggy Hunt	Call with UK attorneys re UK asset recovery issues	0.50	177.75
07/22/20	Peggy Hunt	Call with UK attorneys re asset recovery issues, and follow up on setting up meetings and issues; correspondence re Aslam bankruptcy files	1.50	533.25
07/23/20	Peggy Hunt	Conference with BRG and UK counsel re asset recovery; follow up cal with BRG and correspondence (1.2); review files on asset recovery issues (1)	2.20	782.10
07/23/20	Peggy Hunt	Correspondence with M. K re administrative issues on international issues	0.10	35.55
07/24/20	Peggy Hunt	Correspondence re tasks	0.20	71.10
07/29/20	Peggy Hunt	Correspondence with M. Blower re asset recovery issues (.3); asset recovery analysis, including reviewing files and obtaining documents necessary for UK defendants and correspondence with J. Wiest re tasks (5.)	5.30	1,884.15
07/30/20	Peggy Hunt	Numerous correspondence with BRG and J. Wiest re asset recovery issues (.4); asset investigation and analysis, correspondence with BRG re same (1.6)	2.00	711.00
07/31/20	Peggy Hunt	Correspondence with M. Blower re I. Aslam bankruptcy issues	0.10	35.55
Total Hours:			14.40	
Total Amount:				\$ 5,119.20
Total Fees:				5,119.20

Invoice No.: 5483224
 Matter No.: 194098.010100

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Description of Professional Services Rendered

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/20	Peggy Hunt	Review claims objection issues outlined by S. Goldberg; call with Epiq re claims objection issues, preparing emails and exhibits	0.80	284.40
07/23/20	Peggy Hunt	Analysis of claims issues and correspondence re same	0.80	284.40
			<hr/>	
			Total Hours:	1.60
			Total Amount:	\$ 568.80
			Total Fees:	568.80

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/06/20	Peggy Hunt	Review and comment on S. Goldberg fee reconsideration declaration	0.30	0.00
07/10/20	Peggy Hunt	Final review and revision of motion to reconsider employment issues	1.30	0.00
07/28/20	Peggy Hunt	Final correspondence on fee notices and correspondence with SEC re same	0.30	0.00
			<hr/>	
			Total Hours:	1.90
			Total Amount:	\$ 0.00
			Total Fees:	0.00

Invoice No.: 5483224
Matter No.: 194098.010100

Page 4

Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Peggy Hunt	22.20	355.50	7,892.10
	1.90	355.50	0.00
Totals:	24.10	327.47	\$ 7,892.10

Invoice No.: 5483224
Re: Receiver for Traffic Monsoon / Receiver Services
Matter No.: 194098.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file

EXHIBIT B



DORSEY & WHITNEY (EUROPE) LLP

199 Bishopsgate
London, EC2M 3UT

Tel: 020-7031 3700
Fax: 020-7031 3799

Vat No. 447 008 166

STATEMENT OF ACCOUNT FOR PROFESSIONAL SERVICES

Peggy Hunt, Traffic Monsoon - Legal
222 South Main Street, 5th Floor
Salt Lake City, UT 84111
U.S.A.

19/8/2020
Invoice No. 201041913

For Legal Services Rendered Through 31 July 2020

INVOICE TOTAL

Total For Current Legal Fees	\$570.50
Total For Current Disbursement and Service Charges	\$31.06
Total For Current Invoice	\$601.56

* Please refer to last page for any unpaid invoices and a current statement of account.

Amounts are shown in U.S. Dollars

For your convenience, please remit payment to the address below or we offer the option of remitting payment electronically by wire transfer. If you have any questions regarding this information, please contact the lawyer you are working with on this project or Dorsey's Accounts Receivable Department at 1-800-861-0760. Thank you.

Mailing Instructions:
Dorsey & Whitney LLP
P.O. Box 1680
Minneapolis, MN 55480-1680

Wire Instructions:

(This account is only for Wire/ACH payments)
ABA Routing Number:
Account Number:
Swift Code:

Please make reference to the invoice number

Service charges are based on rates established by Dorsey & Whitney. A schedule of those rates has been provided and is available upon request. Disbursements and service charges, which either have not been received or processed, will appear on a later statement.

ALL INVOICES ARE DUE 30 DAYS FROM DATE OF INVOICE UNLESS OTHERWISE EXPRESSLY AGREED BY DORSEY & WHITNEY



DORSEY & WHITNEY (EUROPE) LLP

199 Bishopsgate
London, EC2M 3UT

Tel: 020-7031 3700
Fax: 020-7031 3799

Vat No. 447 008 166

STATEMENT OF ACCOUNT FOR PROFESSIONAL SERVICES

Peggy Hunt, Traffic Monsoon - Legal
222 South Main Street, 5th Floor
Salt Lake City, UT 84111
U.S.A.

19/8/2020
Invoice No. 201041913

Client-Matter No.: 502566-00006
PMH /Traffic Monsoon - International

For Legal Services Rendered Through 31 July 2020

01/07/20	F. Sacree	0.10	22.50	Reviewing and sending email to court re inspection of the documents, as per M. Blower
01/07/20	J. Lewin	0.20	93.00	Draft email to court
01/07/20	M. Blower	0.40	260.00	Review draft email to court; updating client
14/07/20	M. Blower	0.30	195.00	Email to client regarding next steps and access to Manchester court file

Total Hours 1.00

Total For Legal Fees	\$570.50
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Disbursements and Service Charges

Filing Fee - Barclaycard - County Court - Traffic Monsoon 01/04/20	31.06
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Service charges are based on rates established by Dorsey & Whitney. A schedule of those rates has been provided and is available upon request. Disbursements and service charges, which either have not been received or processed, will appear on a later statement.

ALL INVOICES ARE DUE 30 DAYS FROM DATE OF INVOICE UNLESS OTHERWISE EXPRESSLY AGREED BY DORSEY & WHITNEY



Peggy Hunt, Traffic Monsoon - Legal
Client-Matter No.: 502566-00006
Invoice No.: 201041913

19/8/2020
Page 2

Total for Disbursements Not Liable to VAT

\$31.06

Total This Invoice

\$601.56

Amounts are shown in U.S. Dollars

Service charges are based on rates established by Dorsey & Whitney. A schedule of those rates has been provided and is available upon request. Disbursements and service charges, which either have not been received or processed, will appear on a later statement.

ALL INVOICES ARE DUE 30 DAYS FROM DATE OF INVOICE UNLESS OTHERWISE EXPRESSLY AGREED BY DORSEY & WHITNEY



DORSEY & WHITNEY (EUROPE) LLP

199 Bishopsgate
London, EC2M 3UT

Tel: 020-7031 3700
Fax: 020-7031 3799

Vat No. 447 008 166

STATEMENT OF ACCOUNT FOR PROFESSIONAL SERVICES

Peggy Hunt, Traffic Monsoon - Legal
222 South Main Street
5th Floor
Salt Lake City
UT 84111
U.S.A.

29/9/2020
Invoice No. 201042016

For Disbursements and Service Charges Rendered Through 29 September 2020

INVOICE TOTAL

Total For Current Disbursement and Service Charges	£1,000.00
Total For Current Invoice	£1,000.00

Amounts are shown in Sterling GBP£

For your convenience, we offer the option of remitting payment electronically by wire transfer. Information necessary to transmit funds electronically is provided below. Thank you.

Barclays Bank plc.
Broadgate Branch
155 Bishopsgate
London EC2

Account Name:
Account No:
Sort Code:
Swift Code:
IBAN No.

Please make reference to the invoice number

Service charges are based on rates established by Dorsey & Whitney. A schedule of those rates has been provided and is available upon request. Disbursements and service charges, which either have not been received or processed, will appear on a later statement.

ALL INVOICES ARE DUE 30 DAYS FROM DATE OF INVOICE UNLESS OTHERWISE EXPRESSLY AGREED BY DORSEY & WHITNEY



DORSEY & WHITNEY (EUROPE) LLP

199 Bishopsgate
London, EC2M 3UT

Tel: 020-7031 3700
Fax: 020-7031 3799

Vat No. 447 008 166

STATEMENT OF ACCOUNT FOR PROFESSIONAL SERVICES

Peggy Hunt, Traffic Monsoon - Legal
222 South Main Street
5th Floor
Salt Lake City
UT 84111
U.S.A.

29/9/2020

Invoice No. 201042016

Client-Matter No.: 502566-00006
PMH / Traffic Monsoon - International

For Disbursements and Service Charges Rendered Through 29 September 2020

Disbursements and Service Charges

Professional Services (BBS Law Ltd) - Local Counsel Invoice No. 41711 dated 31/07/20	£1,000.00
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Total for Disbursements	£1,000.00
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Total This Invoice	£1,000.00
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Amounts are shown in Sterling GBP£

Service charges are based on rates established by Dorsey & Whitney. A schedule of those rates has been provided and is available upon request. Disbursements and service charges, which either have not been received or processed, will appear on a later statement.

ALL INVOICES ARE DUE 30 DAYS FROM DATE OF INVOICE UNLESS OTHERWISE EXPRESSLY AGREED BY DORSEY & WHITNEY



DORSEY & WHITNEY (EUROPE) LLP trading as Dorsey & Whitney (Europe) LLP
 199 Bishopsgate
 London
 EC2M 3UT

Email:

Securities and Exchange Commission v Traffic Monsoon LLC and Charles David Scoville
Invoice No: 8261

Account No: 417811	Tax Point: 31/07/2020				
	Costs	Disbursements	Recharges & Expenses	VAT	VAT Rate
To professional charges in relation to acting on your behalf on the above matter					
In the agreed amount	£1,000.00			£200.00	20%
TOTALS	£1,000.00	£ 0.00	£ 0.00	£200.00	
With Compliments			Total Charges	£1,200.00	
BBS Law Ltd					
Bank Details:					
BBS Law Ltd Client Account					
Handelsbanken plc					
Trinity Tower, 9 Thomas More Street					
London E1W 1WY					
Client Account: 21127002					
Sort Code: 40-51-62					
Please quote: CW/417811					

V.A.T. Reg. No. 142 4885 05

Our standard payment terms are 30 days from the date of this invoice

Click [here](#) to pay online 

London Office: Ninth Floor, City Tower, 40 Basinghall Street, London, EC2V 5DE T: 0204 505 8080
 Manchester Office: First Floor, The Edge, Clowes Street, Manchester M3 5NA
 mail@bbslaw.co.uk | www.bbslaw.co.uk | Fax: 0161 834 4826 |

BBS Law Ltd is a limited company registered in England registered number 07202211. The term Partner is used to refer to a Director of BBS Law Ltd. A list of Directors of BBS Law Ltd is open to inspection at its registered office, First Floor, The Edge, Clowes Street, Manchester M3 5NA. Authorised and regulated by the Solicitors Regulation Authority Practice ID No.556112 V.A.T. 142 4885 05

EXHIBIT C

Peggy Hunt- Receiver for Traffic Monsoon/Legal Services
Services Rendered July 1, 2020 to July 30, 2020

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	5.50	\$ 1,828.50	\$ (247.50)	\$ 1,581.00
TMLS-TMLS002	Asset Recovery	50.8	18,809.50	-	\$ 18,809.50
TMLS-TMLS003	Claims Administration	7.9	2,704.50	-	\$ 2,704.50
TMLS-TMLS004	Fee Issues	14.3	\$ 4,762.50	(4,762.50)	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -		\$ -
TMLS-TMLS006	International	51.4	\$ 33,429.50		\$ 33,429.50
	Total Fees	129.90	\$ 61,534.50	\$ (5,010.00)	\$ 56,524.50
TMLS-TMLS007	Out-of-Pocket Expenses		21.27		\$ 21.27
	Invoice Total				\$ 56,545.77



Invoice No. : 5483244
File No. : 194096.010100
Bill Date : August 4, 2020

Peggy Hunt
222 S. Main Street, 5th Floor
Salt Lake City, UT 84101

INVOICE

Re: Receiver for Traffic Monsoon/Legal Services

Legal Services through July 31, 2020:

	\$	61,534.50
Less Courtesy Discount:	\$	(5,010.00)
Total Fees:	\$	56,524.50

Expenses:

Information and Research

21.27

Total Expenses:	\$	21.27
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Current Invoice:	\$	56,545.77
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Invoice No.: 5483244
 Matter No.: 194096.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/14/20	Carson Heninger	Reviewed documents and file re: case background (billed 1/2 time)	0.75	247.50
07/16/20	Sarah Goldberg	Team strategy meeting regarding claims process, and other matters (.8); review outstanding matters (.1)	0.90	310.50
07/16/20	Carson Heninger	Interoffice meeting with GT attorneys discussing case and action items.	0.80	264.00
07/16/20	Carson Heninger	Call with John Wiest discussing projects going forward.	0.30	99.00
07/16/20	John Wiest	Meet with P. Hunt, S. Goldberg, and C. Heninger re action items (.8); correspondence with P. Hunt and J. Shaw re FTI payment (.2)	1.00	330.00
07/16/20	John Wiest	Meet with C. Heninger and correspondence with C. Heninger re tasks (.5)	0.50	165.00
07/17/20	Carson Heninger	Conference with J. Weist re tasks.	0.50	165.00
Total Hours:			4.75	
			Total Amount:	\$ 1,581.00
			Total Fees:	1,581.00

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/07/20	John Wiest	Research potential actions against payment processors (.4)	0.40	132.00
07/08/20	Ian Jack	Commerce call with John Wiest providing background. Email from John Wiest with background papers	0.80	748.00
07/08/20	John Wiest	Phone conference with B. Vitou, R. Cheetham, and I. Jack re issues in the UK (1.4); phone conference with P. Hunt re same (.3); draft summary to B. Vitou re same (1.2); research potential actions against payment processors (3)	5.90	1,947.00
07/09/20	John Wiest	Research possible actions against payment processors (.3)	0.30	99.00
07/13/20	Struan F. Clark	Telecon with Utah office re Traffic Monsoon	1.20	324.00
07/13/20	John Wiest	Phone conference with P. Hunt, M.	3.40	1,122.00

Invoice No.: 5483244
Matter No.: 194096.010100

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Description of Professional Services Rendered

		Khamisa, B. Vitou, J. Ian, and P. Hunt re possible actions in UK against net winners (1.2); draft memorandum re case background and key documents to London colleagues (2.2)		
07/14/20	Ian Jack	Emails John Wiest regarding bankruptcy searches in relation to Imtiaz Aslam	0.70	654.50
07/14/20	John Wiest	Phone conference with P. Hunt, M. Khamisa, B. Vitou, J. Ian, and P. Hunt re possible actions in UK against net winners (1.2); draft memorandum re case background and key documents to London colleagues (2.1)	0.50	165.00
07/15/20	Ian Jack	Conference call with Peggy Hunt and others providing background. Email to John Wiest regarding use of agents in Manchester to obtain court papers	0.90	841.50
07/15/20	John Wiest	Phone conference with P. Hunt, M. Khamisa, B. Vitou, J. Ian, and P. Hunt re possible actions in UK against net winners (1.2); draft memorandum re case background and key documents to London colleagues (2.1)	0.70	231.00
07/16/20	Carson Heninger	Investigated Payza and the DOJ proceedings.	1.20	396.00
07/16/20	John Wiest	Meet with and correspondence with C. Heninger re motions for turnover (.2)	0.20	66.00
07/17/20	Carson Heninger	(1.5) reviewed pleadings from zeekrewards.com case (.8) researched background of Payza; (.8) research re turnover motions; (.3) drafted portion of memo.	3.40	1,122.00
07/17/20	John Wiest	Correspondence with I. Bean, S. Clark, M. Khamisa, and P. Hunt re transfer of Manchester flat and discovery issues	0.60	198.00
07/20/20	Carson Heninger	Reviewed pleadings in ZeekRewards case and did preliminary research regarding turnover motions.	1.50	495.00
07/20/20	Ian Jack	Conference call with Peggy Hunt and others in relation to various queries relating to bank accounts and ability to bring proceedings against individuals	1.10	1,028.50
07/20/20	John Wiest	Phone conference with P. Hunt, M. Khamisa, B. Vitou, and J. Ian, re possible actions in UK against net winners (.9); phone conference with P. Hunt re same (.1); correspondence with P. Hunt, M. Khamisa, J. Ian, and S. Clark re service on UK defendants (.3)	1.30	429.00
07/22/20	Carson Heninger	Researched re turnover motions and contempt of court proceedings.	2.80	924.00
07/22/20	John Wiest	Phone conference with P. Hunt, M. Khamisa, B. Vitou, I. Bean re possible	1.30	429.00

Invoice No.: 5483244
 Matter No.: 194096.010100

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Description of Professional Services Rendered

		actions in UK against net winners (.8); phone conference with P. Hunt, R. Strong, and J. Shaw re same (.5)		
07/23/20	Carson Heninger	Researched and began preparing memo on turnover motions.	1.80	594.00
07/23/20	John Wiest	Phone conference with P. Hunt, M. Khamisa, I. Bean, R. Strong, and J. Shaw re financial information re possible actions in UK against net winners (.8)	0.80	264.00
07/26/20	John Wiest	Correspondence with P. Hunt re payment processors (.2)	0.20	66.00
07/27/20	Carson Heninger	(.3) reviewed notes of actions and proposed plans for recovery of assets from e-wallet companies.	0.40	132.00
07/27/20	John Wiest	Draft motion for default judgment against Ganz (.1)	0.10	33.00
07/28/20	Carson Heninger	Researched personal jurisdiction issues with foreign defaulted parties.	1.90	627.00
07/28/20	John Wiest	Draft motion for summary judgment against Ganz (.6); correspondence with C. Heninger re research on personal jurisdiction (.3)	0.90	297.00
07/29/20	Carson Heninger	Researched case law on specific personal jurisdiction regarding internet contacts and drafted email summarizing research.	4.60	1,518.00
07/29/20	John Wiest	Draft motion for summary judgment against Ganz (2); review exhibits re Receiver's declaration in support of preliminary injunction and correspondence with P. Hunt re same (2)	4.00	1,320.00
07/30/20	Carson Heninger	(.9) reviewed pleadings from ZeekRewards case; (1.5) researched law on ancillary and supplemental jurisdiction to give citations for motion for default judgment (.5).	2.00	660.00
07/30/20	John Wiest	Draft motion for summary judgment against Ganz (2.6); research on prejudgment interest and personal jurisdiction (4)	5.60	1,848.00
07/31/20	John Wiest	Correspondence with P. Hunt re default judgment motion (.3)	0.30	99.00

Total Hours: 50.80

Total Amount: \$ 18,809.50
 Total Fees: 18,809.50

Invoice No.: 5483244
 Matter No.: 194096.010100

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Description of Professional Services Rendered

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/20	Sarah Goldberg	Review filed claims and analyze potential objections and strategy (3); call with Epiq regarding objections and next steps (.7)	3.70	1,276.50
07/01/20	John Wiest	Phone conference with S. Goldberg re claims process (.5)	0.50	165.00
07/06/20	Sarah Goldberg	Review and analyze issues regarding claims from F. Santos	2.70	931.50
07/07/20	John Wiest	Phone conference with S. Goldberg re claims process (.5)	0.90	297.00
07/22/20	Sarah Goldberg	Call to company interested in purchasing claims	0.10	34.50
Total Hours:			7.90	
Total Amount:				\$ 2,704.50
Total Fees:				2,704.50

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/20	Sarah Goldberg	Begin preparing declaration for motion to reconsider employing GT	0.90	0.00
07/06/20	Sarah Goldberg	Draft declaration regarding billing rate	1.00	0.00
07/06/20	John Wiest	Draft notices of fee requests for April through June 2020 (1.6)	1.60	0.00
07/07/20	John Wiest	Correspondence with P. Hunt and S. Goldberg re declarations in support of motion to reconsideration employment application (.1)	0.10	0.00
07/08/20	John Wiest	Correspondence re declarations	0.20	0.00
07/10/20	Sarah Goldberg	Revisions regarding motion to reconsider order of rate limitations	1.00	0.00
07/10/20	John Wiest	Review and revise motion to reconsider motion to employ GT, Goldberg declaration re same, and Wiest declaration re same (1); draft proposed order granting same (.3)	1.30	0.00
07/13/20	John Wiest	Finalize and file motion to reconsider order conditionally granting motion to employ GT (.8)	0.80	0.00
07/14/20	Carson Heninger	Researched similar cases and analyzed attorney fees allowed. Drafted email to co-counsel.	1.40	0.00
07/14/20	John Wiest	Correspondence with P. Hunt and S.	0.30	0.00

Invoice No.: 5483244
 Matter No.: 194096.010100

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Description of Professional Services Rendered

07/16/20	Carson Heninger	Goldberg re hearing on fee issues (.3)	0.20	0.00
07/23/20	Carson Heninger	(.2) reviewed pleadings;	1.00	0.00
		Reviewed exhibits and prepared fee notices. Discussed with John Wiest and Peggy Hunt. Reviewed emails relating to fee notices and emailed Peggy Hunt.		
07/23/20	John Wiest	Correspondence with C. Heninger re April to June fee notices (.1)	0.10	0.00
07/27/20	Carson Heninger	Drafted fee notices, reviewed invoices, reviewed emails, drafted emails to appropriate parties to review and sign notices.	2.40	0.00
07/27/20	Carson Heninger	Reviewed Dorsey invoices and corresponded with them to finalize fee notices.	0.40	0.00
07/28/20	Carson Heninger	Prepared and finalized fee notices.	1.20	0.00
07/29/20	Carson Heninger	Reviewed email from S. Marsden and complete fee notices for April and May. Emailed to P. Hunt.	0.40	0.00
			<hr/>	
			Total Hours:	14.30
			Total Amount:	\$ 0.00
			Total Fees:	0.00

TASK CODE: TMLS006 INTERNATIONAL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/20	Rupert Cheetham	Research on cross-border recognition of foreign insolvency officeholder; considering public information on Traffic Monsoon bankruptcy case; preparing for and attending call with John Wiest, Ian Jack and Barry Vitou; follow up call with Ian Jack.	2.50	1,850.00
07/08/20	Barry Vitou	Conference call.	0.70	654.50
07/09/20	Rupert Cheetham	Call with Mohammed Khamisa in relation to Santander disclosure, recognition and asset tracing remedies in the UK; call to Ian Jack in relation to next steps; email to John Wiest.	1.10	814.00
07/09/20	Mohammed J. Khamisa	Reading email from Barry Vitou and as to the case from the decisions of the District Court and Appeals court	1.30	1,202.50
07/13/20	Rupert Cheetham	Research on cross-border recognition of foreign insolvency officeholder; discussion with Ian Jack	1.30	962.00
07/13/20	Mohammed J. Khamisa	Telecon with PH/JW/BV to discuss the	1.30	1,202.50

Invoice No.: 5483244
Matter No.: 194096.010100

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Description of Professional Services Rendered

		options available to them in relation to proceedings) obtaining disclosure of information from Santander UK in relation to the bank account; b) recognition of a US receiver in England pre and post judgement; and c) potential claims in England against accomplices of Scoville (including in relation to the claim of the bankruptcy estate to the proceeds of the sale of the apartment). here; recognition of Receiver. agenda items:		
07/13/20	Mohammed J. Khamisa	Reviewing further material in email from JW and attachment re: Aslam-LOR; FTI; various orders; class action claims	2.30	2,127.50
07/13/20	Barry Vitou	Conference call.	1.00	935.00
07/14/20	Ian Bean	Discussion of background with MKQC plus considering/agreeing next steps.	1.20	786.00
07/14/20	Struan F. Clark	Reading through documents sent by Utah office	1.60	432.00
07/14/20	Struan F. Clark	Initial meeting with Mo and Ian B	0.60	162.00
07/14/20	Barry Vitou	Email in. Brief review of FTI report.	0.30	280.50
07/15/20	Rupert Cheetham	Reviewing emails re personal bankruptcy of Imtiaz Aslam	0.40	296.00
07/15/20	Jack Parish	GT UK - Helping Ian/Rupert. Collating information on Imtiaz Aslam / Traffic Monsoon. Companies House, insolvency, K16, Gazette and High Court searches. Correspondence. Status update. Calling Manchester court.	1.60	432.00
07/15/20	Barry Vitou	IJ email in and review.	0.10	93.50
07/17/20	Ian Bean	Detailed review of documents and discussion of next steps with Mohammed.	7.70	5,043.50
07/17/20	Struan F. Clark	Strategy meeting re Traffic Monsoon	0.40	108.00
07/17/20	Struan F. Clark	Email summary for Ian	0.50	135.00
07/17/20	Struan F. Clark	Review of documents	0.70	189.00
07/17/20	Mohammed J. Khamisa	Email from JW attaching Netwinners schedule; Sarah Spindley's statement re: Manchester Flat ; executed LORs. Perusal of the PPL docs	1.70	1,572.50
07/19/20	Struan F. Clark	Reading all docs related to Manchester property sale	1.40	378.00
07/20/20	Ian Bean	Further review of documents, preparation of strategy note for discussion with Mohammed and attendance on call with Peggy and John to discuss next steps.	3.60	2,358.00
07/20/20	Struan F. Clark	Strategy draft	1.20	324.00
07/20/20	Struan F. Clark	Traffic Monsoon call	0.70	189.00
07/20/20	Mohammed J. Khamisa	Reading affidavits of process servers on defendants in the UK	1.00	925.00
07/20/20	Mohammed J. Khamisa	Reviewing note and summary from team following their detailed review of additional papers	0.50	462.50
07/20/20	Mohammed J. Khamisa	Reviewing the draft note for telecon with	1.00	925.00

Invoice No.: 5483244
 Matter No.: 194096.010100

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Description of Professional Services Rendered

		PH		
07/21/20	Struan F. Clark	Reading through court summons sent by John Wiest	0.50	135.00
07/22/20	Ian Bean	Preparation for and attendance on call with Peggy and John.	1.90	1,244.50
07/22/20	Struan F. Clark	Strategy discussions with MK and IB	0.60	162.00
07/22/20	Struan F. Clark	Preparing for call with the US	0.50	135.00
07/22/20	Struan F. Clark	Call with the US	0.80	216.00
07/22/20	Mohammed J. Khamisa	Telecon with PH/JW to discussion the case and update and review of material received from them so far	1.00	925.00
07/23/20	Ian Bean	Reviewing documents (.8), discussion of strategy with Mohammed, plus attendance on call with Peggy and BRG team (.8)	1.80	1,179.00
07/23/20	Mohammed J. Khamisa	Team discussion of EL; outstanding data and next steps	0.30	277.50
07/23/20	Mohammed J. Khamisa	Telecon with Peggy Hunt/Ray and Jeff from BRG to discuss their forensic data analysis and to explain the information that is required for making our applications against the defendants	1.00	925.00
07/27/20	Ian Bean	Considering excel spreadsheet provided by BRG, emails with BRG re same plus further reviewing documents in order to pursue bankers trust order.	3.10	2,030.50
07/29/20	Ian Bean	Kickoff call with Amy Rogers (Barrister) in order to discussion approach, plus working on bundle of documents and sending to Amy.	0.80	524.00
07/29/20	Struan F. Clark	Organising documents and sending to barrister	0.70	189.00
07/31/20	Mohammed J. Khamisa	Reading email from JW re: review of bankruptcy file by local agent in Manchester. Reading the summary. Drafting reply to JW dealing questions raised.	0.70	647.50

Total Hours: 51.40

Total Amount: \$ 33,429.50
 Total Fees: 33,429.50

Invoice No.: 5483244
 Matter No.: 194096.010100

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Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Ian Jack	3.50	935.00	3,272.50
Mohammed J. Khamisa	12.10	925.00	11,192.50
Barry Vitou	2.10	935.00	1,963.50
Rupert Cheetham	5.30	740.00	3,922.00
Struan F. Clark	11.40	270.00	3,078.00
Sarah Goldberg	7.40	345.00	2,553.00
Sarah Goldberg	2.90	345.00	0.00
Carson Heninger	21.95	330.00	7,243.50
Carson Heninger	7.00	330.00	0.00
Jack Parish	1.60	270.00	432.00
John Wiest	29.4	287.04	9,702.00
John Wiest	4.40	330.00	0.00
Ian Bean	20.10	655.00	13,165.50
Totals:	129.15	437.67	\$ 56,524.50

Invoice No.: 5483244
 Re: Receiver for Traffic Monsoon/Legal Services
 Matter No.: 194096.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
07/24/20	VENDOR: Company Registrations Online Limited; INVOICE#: 244811; DATE: 7/24/2020 - Fees in connection with the provision of full insolvency reports & bankruptcy petition search	\$ 21.27
Total Expenses:		\$ 21.27

EXHIBIT D



Peggy Hunt
Greenberg Traurig, LLP
222 South Main Street, 5th Floor
Salt Lake City, UT 84101

September 24, 2020
Client-Matter: 997-14823
Invoice #: 102435
Tax ID # 27-1451273

Via Email: huntp@gtlaw.com

RE: Traffic Monsoon Receivership

Services Rendered From July 1, 2020 Through July 31, 2020

Professional Services	\$ 12,618.00	USD
Voluntary Reduction	(313.50)	
Expenses Incurred	132.19	
CURRENT CHARGES	\$ 12,436.69	USD

PAYMENT IS DUE BY October 24, 2020

Please direct questions regarding this invoice to: Jeff Shaw at (801) 364-6233 or JShaw@thinkbrg.com.

Please remit payment by check to:
Berkeley Research Group, LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:
Bank Name:
SWIFT:
ABA #:
Account Name
Account #:
Reference:

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**



To: Peggy Hunt
c/o: Greenberg Traurig, LLP
RE: Traffic Monsoon Receivership

Page 2 of 6
Invoice # 102435
Client-Matter: 00997-014823

Services Rendered From July 1, 2020 Through July 31, 2020

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Ray Strong	330.00	22.50	7,425.00
Senior Managing Consultant			
Jeffrey Shaw	285.00	14.70	4,189.50
Jeffrey Shaw	0.00	1.10	N/C
Senior Associate			
Jason Strong	230.00	3.00	690.00
Total Professional Services		41.30	12,304.50

EXPENSES

Data Retrieval	82.19
Subcontracted Services	50.00
Total Expenses	132.19



To: Peggy Hunt
c/o: Greenberg Traurig, LLP
RE: Traffic Monsoon Receivership

Page 3 of 6
Invoice # 102435
Client-Matter: 00997-014823

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
110.0000	General Accounting Issues	2.90	826.50
120.0000	Monthly Operating Report Preparation	1.10	313.50
500.0000	Avoidance Action Analysis	36.20	11,164.50
950.0000	Fee Application Preparation & Hearing	1.10	0.00
Total Professional Services		41.30	12,304.50



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

Page 4 of 6
 Invoice # 102435
 Client-Matter: 00997-014823

Services Rendered From July 1, 2020 Through July 31, 2020

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 110.0000 - General Accounting Issues					
07/13/20	Jeffrey Shaw	Emails regarding professional fee payments.	0.20	285.00	57.00
07/14/20	Jeffrey Shaw	Reviewed, prepared and coordinated payment of outstanding payables.	1.10	285.00	313.50
07/14/20	Jeffrey Shaw	Call with Metro Bank and email to Receiver regarding wire issues.	0.50	285.00	142.50
07/15/20	Jeffrey Shaw	Reviewed bank activity to confirm status of payment and email regarding the same.	0.30	285.00	85.50
07/16/20	Jeffrey Shaw	Follow-up regarding payments.	0.20	285.00	57.00
07/16/20	Jeffrey Shaw	Reviewed bank statements and email to Receiver regarding the same.	0.20	285.00	57.00
07/20/20	Jeffrey Shaw	Recorded activity in Trust Works.	0.40	285.00	114.00
Total for Task Code 110.0000			2.90		826.50
Task Code: 120.0000 - Monthly Operating Report Preparation					
07/20/20	Jeffrey Shaw	Reviewed activity for the quarter ended 6.30.20 and prepared quarterly report.	1.10	285.00	313.50
Total for Task Code 120.0000			1.10		313.50
Task Code: 500.0000 - Avoidance Action Analysis					
07/23/20	Jeffrey Shaw	Attended call with Receiver regarding net winner strategy and process.	0.20	285.00	57.00
07/23/20	Jeffrey Shaw	Attended call with UK counsel regarding net winner strategy and process.	0.60	285.00	171.00
07/23/20	Ray Strong	Attended call with UK litigation team regarding avoidance action issues.	0.60	330.00	198.00
07/23/20	Ray Strong	Discussed call with UK litigation team with the Receiver to coordinate requests.	0.20	330.00	66.00
07/23/20	Ray Strong	Analyzed case data and information in preparation for call with UK litigation team.	1.10	330.00	363.00



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

Page 5 of 6
 Invoice # 102435
 Client-Matter: 00997-014823

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/26/20	Ray Strong	Reviewed and analyzed transaction activity for UK legal team prosecution of claw back claims.	6.20	330.00	2,046.00
07/27/20	Jeffrey Shaw	Discussion regarding analysis to be completed in connection with UK claw back actions.	0.30	285.00	85.50
07/27/20	Jeffrey Shaw	Reviewed activity and prepared net winner schedules for UK claw backs.	3.50	285.00	997.50
07/27/20	Ray Strong	Analyzed case documentation and TM website data at request from UK legal team for prosecution of net winner claims.	2.10	330.00	693.00
07/28/20	Jeffrey Shaw	Reviewed activity and prepared net winner schedules for UK claw backs.	4.50	285.00	1,282.50
07/28/20	Ray Strong	Analyzed net winner data and documentation at request of UK legal team for prosecution of net winner claims.	2.50	330.00	825.00
07/30/20	Jeffrey Shaw	Reviewed data, prepared schedules and submitted to UK counsel regarding net winners.	0.90	285.00	256.50
07/30/20	Jeffrey Shaw	Reviewed and updated UK net winner schedules.	0.70	285.00	199.50
07/30/20	Ray Strong	Analyzed case documentation for payment processor information for members at request of UK legal team for prosecution of net winner claims.	1.50	330.00	495.00
07/30/20	Jason Strong	Re-setup www.trafficmonsoon.com to work in server's new location. Troubleshoot and fixed SMTP issue for register and verification emails not being sent in connection with avoidance actions.	3.00	230.00	690.00
07/30/20	Ray Strong	Analyzed net winner data and documentation at request of UK legal team for prosecution of net winner claims.	2.80	330.00	924.00
07/30/20	Ray Strong	Analyzed TM website data and member on-boarding process to assist UK legal team regarding prosecution of net winner claims.	4.10	330.00	1,353.00



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

Page 6 of 6
 Invoice # 102435
 Client-Matter: 00997-014823

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/31/20	Ray Strong	Compiled documentation, data, and information for UK legal team to assist with prosecution of net winner claims.	1.40	330.00	462.00
Total for Task Code 500.0000			36.20		11,164.50
Task Code: 950.0000 - Fee Application Preparation & Hearing					
07/16/20	Jeffrey Shaw	Reviewed and revised time entries and descriptions for June 2020 bill.	0.40	0.00	N/C
07/17/20	Jeffrey Shaw	Reviewed, finalized and submitted June bill.	0.30	0.00	N/C
07/27/20	Jeffrey Shaw	Reviewed and verified May-Jun 2020 fee notices.	0.40	0.00	N/C
Total for Task Code 950.0000			1.10		0.00
Professional Services			41.30		12,304.50

DETAIL OF EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/30/20	CCH - CCH 6/24/20 - Data Retrieval Invoice #: 5411176877 Vchr Comment: Account #4001041067 Timekeeper : 09999 - Applicable, Not	75.69
07/31/20	CCH - CCH 7/28/20 - Data Retrieval Invoice #: 5411213869 Vchr Comment: Account #4001041067 Timekeeper : 09999 - Applicable, Not	6.50
07/31/20	Strong Connexions, Inc. - Subcontracted Services- Server Backup Invoice #: 6671 Vchr Comment: Services of Jason Strong on Matter# 14823 in July 2020. Timekeeper : 03021 - Strong, Jason	50.00
Expenses		132.19

EXHIBIT 3

Peggy Hunt (Utah #6060)
Sarah Goldberg (Utah #13222)
John J. Wiest (Utah #15767)
GREENBERG TRAUIG, LLP
222 South Main Street, 5th Floor
Salt Lake City, UT 84101
Telephone: (801) 478-6900
huntp@gtlaw.com
goldbergsa@gtlaw.com
wiestj@gtlaw.com

Attorneys for Court-Appointed Receiver Peggy Hunt

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

TRAFFIC MONSOON, LLC, a Utah limited
liability company, and CHARLES DAVID
SCOVILLE, an individual,

Defendants.

**NOTICE OF REQUEST FOR PAYMENT
BY RECEIVER AND RECEIVER'S
PROFESSIONALS**

**(AUGUST 1, 2020, THROUGH
AUGUST 31, 2020)**

2:16-cv-00832-JNP

The Honorable Jill N. Parrish

Pursuant to the *Order Establishing Administrative Expense Payment Procedures* entered by the Court on June 13, 2017,¹ Peggy Hunt, the Court-appointed receiver in the above-captioned case (the “Receiver”), hereby submits the following *Notice of Request for Payment by Receiver and Receiver’s Professionals* related to fees and expenses incurred during the period of August 1, 2020, through August 31, 2020 (the “Notice”). The fees and expenses detailed in this

¹ Docket No. [101](#).

Notice have been reviewed and approved, subject to Court approval, by the Receiver. This Notice was served on the Securities and Exchange Commission on October 6, 2020, and the Commission has informed the Receiver it does not oppose this request.

<u>Name of Applicant</u>	Receiver
Total Hours of Service	11.70
Total Fees for Time Period	\$ 4,017.15²
Total Expenses for Time Period	\$ 0.00
Total	\$ 4,017.15
Total Interim Payment Requested: (80% of Fees and 100% of Expenses)	\$ 3,213.72
Remaining Balance:	\$ 803.43
Time and Services Detail:	Exhibit A

<u>Name of Applicant</u>	Greenberg Traurig, LLP
Total Hours of Service	99.30
Total Fees for Time Period	\$ 34,334.50³
Total Expenses for Time Period	\$ 0.00
Total	\$ 34,334.50
Total Interim Payment Requested: (80% of Fees and 100% of Expenses)	\$ 27,467.60
Remaining Balance:	\$ 6,866.90
Time and Services Detail:	Exhibit B

² Incurred fees totaling \$4,159.35, less a voluntary reduction of fees in the amount of \$142.20.

³ Incurred fees totaling \$36,611.50, less a voluntary reduction of fees in the amount of \$2,277.00.

<u>Name of Applicant</u>	Berkeley Research Group
Total Hours of Service	46.80
Total Fees for Time Period	\$ 13,918.50⁴
Total Expenses for Time Period	\$ 50.50
Total	\$ 13,969.00
Total Interim Payment Requested: (80% of Fees and 100% of Expenses)	\$ 11,185.30
Remaining Balance:	\$ 2,783.70
Time and Services Detail:	Exhibit C

[Signature Page Follows]

⁴ Incurred fees totaling \$14,061.00, less a voluntary reduction of fees in the amount of \$142.50.

DATED October 12, 2020.

RECEIVER

/s/ Peggy Hunt

Peggy Hunt

GREENBERG TRAURIG, LLP

/s/ Sarah Goldberg

Sarah Goldberg

Counsel for Receiver

BERKELEY RESEARCH GROUP

/s/ Marvin Tenenbaum

Marvin Tenenbaum

Senior Vice President & Special Advisor to
the Chairman

Accountants for Receiver

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record in this case.

/s/ Carson Heninger

I further certify that on October 12, 2020, I caused the foregoing to be served as follows:

Via Email:

The SEC

Casey Fronk
Daniel J. Wadley
Amy J. Oliver
Cheryl M. Mori
fronkc@sec.gov
waldleyd@sec.gov
olivera@sec.gov
moric@sec.gov

BRG

Matt K. Babcock
Jeff Shaw
Ray Strong
mbabcock@thinkbrg.com
JShaw@thinkbrg.com
rstrong@thinkbrg.com

Via U.S. Mail, First Class, postage pre-paid:

Traffic Monsoon
c/o Charles Scoville
JUAB COUNTY JAIL
PO BOX 133
NEPHI, UT 84648

Charles David Scoville
JUAB COUNTY JAIL
PO BOX 133
NEPHI, UT 84648

/s/ Candy Long

EXHIBIT A

Peggy Hunt- Receiver for Traffic Monsoon/Receiver Services
 Services Rendered August 1, 2020 to August 31, 2020

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	2.70	\$ 959.85		\$ 959.85
TMLS-TMLS002	Asset Recovery	6.2	2,204.10	-	\$ 2,204.10
TMLS-TMLS003	Claims Administration	2.4	853.20	-	\$ 853.20
TMLS-TMLS004	Fee Issues	0.4	\$ 142.20	(142.20)	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -		\$ -
TMLS-TMLS006	International	0.0	\$ -		\$ -
	Total Fees	11.70	\$ 4,159.35	\$ (142.20)	\$ 4,017.15
TMLS-TMLS007	Out-of-Pocket Expenses		-		\$ -
	Invoice Total				\$ 4,017.15



Invoice No. 5483243
File No. 194098.010100
Bill Date : September 30, 2020

Peggy Hunt
222 S. Main Street, 5th Floor
Salt Lake City, UT 84101

INVOICE

Re: Receiver for Traffic Monsoon / Receiver Services

Legal Services through August 31, 2020:

	\$	5,557.50
Less Courtesy Discount:	\$	<u>(1,540.35)</u>
Total Fees:	\$	4,017.15
Current Invoice:	\$	<u><u>4,017.15</u></u>

Invoice No.: 5483243
 Matter No.: 194098.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/03/20	Peggy Hunt	Review memo from J. Wiest re status of numerous items; numerous correspondence with J. Wiest, S. Goldberg and C. Heninger re tasks	0.40	142.20
08/13/20	Peggy Hunt	Correspondence and conference with C. Heninger re tasks	0.10	35.55
08/18/20	Peggy Hunt	Attend to banking and Epiq bill issues	0.20	71.10
08/20/20	Peggy Hunt	Attend to numerous administrative matters; conference with J. Shaw re status	1.00	355.50
08/24/20	Peggy Hunt	Prepare for and attend call with Stretto re cost savings on claims process	0.50	177.75
08/26/20	Peggy Hunt	Analysis of tasks and status; correspondence re same; correspondence re status report (.5)	0.50	177.75
			Total Hours:	2.70
			Total Amount:	\$ 959.85

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/05/20	Peggy Hunt	Conference with J. Wiest re default interest; call with M. Thomson re payment processor issues (.3); strategy call re payment processing companies (.3); correspondence re payment processing companies (.2); review and comment on Ganz default judgment motion (.8)	1.60	568.80
08/06/20	Peggy Hunt	Review and comment on R. Strong declaration on Ganz default; conference with BRG re same	0.90	319.95
08/07/20	Peggy Hunt	Call with UK team on asset recovery strategy and issues	0.50	177.75
08/13/20	Peggy Hunt	Correspondence with UK office on investigation of net winners	0.20	71.10
08/18/20	Peggy Hunt	Correspondence re Ganz judgment and interest issues (.3); review investigator proposal on winners, analysis of same, and correspondence with S. Clark re same (1.1)	1.40	497.70
08/19/20	Peggy Hunt	Correspondence re asset recovery issues	0.30	106.65

Invoice No.: 5483243
 Matter No.: 194098.010100

Page 2

Description of Professional Services Rendered

08/20/20	Peggy Hunt	Review and comment on declaration on Ganz default judgment and correspondence re same (.5); review and comment on letter of request re Santandar bank records (.5)	1.00	355.50
08/20/20	Peggy Hunt	Correspondence and call with R. Strong re default judgment declaration content	0.30	106.65
			<hr/>	
Total Hours:			6.20	
			Total Amount:	\$ 2,204.10

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/18/20	Peggy Hunt	Conference with S. Goldberg re claims; follow up on same	0.30	106.65
08/26/20	Peggy Hunt	Review and analysis of claims procedure motion and suggested procedures, and revisions to same (1.5); correspondence with S. Goldberg re same (.1)	1.60	568.80
08/28/20	Peggy Hunt	Call with S. Goldberg re claim procedures and follow up	0.50	177.75
			<hr/>	
Total Hours:			2.40	
			Total Amount:	\$ 853.20

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/20	Peggy Hunt	Review Dorsey invoice; correspondence with S. Marsden re issues with same; review revised invoices; correspondence with C. Heninger re preparing June fee notice	0.40	0.00
			<hr/>	
Total Hours:			0.40	
			Total Amount:	\$ 0.00

Invoice No.: 5483243
Matter No.: 194098.010100

Page 3

Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Peggy Hunt	0.40	0.00	0.00
Peggy Hunt	11.30	355.50	4,017.15
Totals:	11.70	343.35	\$ 4,017.15

Invoice No.: 5483243
Re: Receiver for Traffic Monsoon / Receiver Services
Matter No.: 194098.010100

Page 4

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file

EXHIBIT B

Peggy Hunt- Receiver for Traffic Monsoon/Legal Services
Services Rendered August 1, 2020 to August 31, 2020

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	0.70	\$ 231.00	\$ -	\$ 231.00
TMLS-TMLS002	Asset Recovery	48.8	16,104.00	-	\$ 16,104.00
TMLS-TMLS003	Claims Administration	23.0	7,935.00	-	\$ 7,935.00
TMLS-TMLS004	Fee Issues	6.9	\$ 2,277.00	(2,277.00)	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -		\$ -
TMLS-TMLS006	International	19.9	\$ 10,064.50		\$ 10,064.50
	Total Fees	99.30	\$ 36,611.50	\$ (2,277.00)	\$ 34,334.50
TMLS-TMLS007	Out-of-Pocket Expenses				\$ -
	Invoice Total				\$ 34,334.50



Invoice No. : 5483249
File No. : 194096.010100
Bill Date : September 30, 2020

Peggy Hunt
222 S. Main Street, 5th Floor
Salt Lake City, UT 84101

INVOICE

Re: Receiver for Traffic Monsoon/Legal Services

Legal Services through August 31, 2020:

	\$	36,611.50
Less Courtesy Discount:	\$	(2,277.00)
Total Fees:	\$	34,334.50

Current Invoice:	\$	<u>34,334.50</u>
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Invoice No.: 5483249
 Matter No.: 194096.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/20	Carson Heninger	Reviewed emails and drafted emails to receiver. Reviewed notice of appearance.	0.30	99.00
08/19/20	John Wiest	Review files transferred from Dorsey and correspondence with P. Hunt re same (.2)	0.20	66.00
08/21/20	John Wiest	Review emails from Dorsey and correspondence with S. Marsden re same	0.20	66.00
Total Hours:			0.70	
			Total Amount:	\$ 231.00
			Total Fees:	231.00

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/03/20	John Wiest	Draft motion for summary judgment against Ganz (.6); draft declaration in support (.5); research prejudgment interest (1.5)	2.60	858.00
08/04/20	John Wiest	Draft motion for summary judgment against Ganz (.4); draft declaration in support (1); research recent case law on personal jurisdiction (2)	3.40	1,122.00
08/05/20	Carson Heninger	Call with P. Hunt, J. Wiest, and M. Thomson regarding status of claims against payment processors. Researched applicable law.	0.70	231.00
08/05/20	John Wiest	Draft declaration in support of motion for default judgment against Ganz (1); phone conference with P. Hunt, C. Heninger, and M. Thomson re payment processor claims (.5); correspondence with London colleagues and BRG re claims against UK defendants (.4); research case law on turnover motions (2.6)	4.50	1,485.00
08/06/20	Carson Heninger	Discussed action items with J. Wiest, reviewed memoranda from BRG regarding fees charged by payment processors, researched applicable law.	1.30	429.00

Invoice No.: 5483249
 Matter No.: 194096.010100

Page 2

Description of Professional Services Rendered

08/06/20	John Wiest	Research case law on motions for turnover against payment processors (1.9); analyze BRG reports re amounts held by payment processors (1); phone conference with Hunt, Strong, Shaw re prejudgment interest (.5); review and revise motion for default judgment against Ganz and declaration in support (.8); review Payza and Allied Wallet agreements (2); draft proposed default judgment (.4)	6.60	2,178.00
08/07/20	John Wiest	Research proposed default judgments and draft proposed default judgment against Ganz (3.1)	3.10	1,023.00
08/10/20	John Wiest	Draft motion for letter of request re Santander (4); draft declaration in support of motion (1.4)	5.40	1,782.00
08/11/20	John Wiest	Draft default judgment against Ganz (.5); draft declaration in support of motion for letter of request re Santander (1); draft proposed letter of request re Santander (3.1)	4.50	1,485.00
08/12/20	John Wiest	Draft proposed letter of request and prepare exhibits (1.7)	1.70	561.00
08/13/20	John Wiest	Correspondence with S. Clark and P. Hunt re hiring investigators in UK (.2)	0.20	66.00
08/18/20	John Wiest	Correspondence Hunt default Ganz letter (.3); draft motion for default judgment against Barker, declaration in support, and proposed default judgment (1.2);	2.80	924.00
08/19/20	John Wiest	Review and analyze TM agreement with Payza (2.1)	2.10	693.00
08/20/20	John Wiest	Review TM agreements with Payza and analyze potential clawback actions for funds owed (3.1); revise declarations in support of motions for default judgment against Ganz and Barker proposed judgments, and military service declarations (2.7)	5.90	1,947.00
08/21/20	John Wiest	Finalize and file motion for default judgment against Ganz and documents in support(1.1); finalize and file motion for default judgment against Barker and documents in support Barker (1.3); correspondence with I. Bean re proposed letter of request (.3)	2.70	891.00
08/31/20	John Wiest	Review Allied Wallet agreements with TM (1.3)	1.30	429.00

Total Hours: 48.80

Total Amount: \$ 16,104.00
 Total Fees: 16,104.00

Invoice No.: 5483249
 Matter No.: 194096.010100

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Description of Professional Services Rendered

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/05/20	Sarah Goldberg	Begin drafting motion to approve claims objection procedure	1.00	345.00
08/11/20	Sarah Goldberg	Draft claim objection motion	5.00	1,725.00
08/12/20	Sarah Goldberg	Analysis of claims and draft claim objection procedure motion	3.80	1,311.00
08/13/20	Sarah Goldberg	Analysis of claims and draft claim objection procedure motion	2.60	897.00
08/14/20	Sarah Goldberg	Draft motion to approve claim objection process	4.20	1,449.00
08/17/20	Sarah Goldberg	Draft claim objection process motion	0.70	241.50
08/19/20	Sarah Goldberg	Review issues relating to Fabio Santos; call with M. Thomson regarding same	1.70	586.50
08/27/20	Sarah Goldberg	Review revisions of Receiver to claim objection procedure motion	0.50	172.50
08/28/20	Sarah Goldberg	Call with Receiver regarding claim objection procedure (.6); review and analyze methods for dealing with contested claims (1.2)	2.80	966.00
08/31/20	Sarah Goldberg	Review claims motion (.4); call with Epiq regarding claim objection issues	0.70	241.50
Total Hours:			23.00	
			Total Amount:	\$ 7,935.00
			Total Fees:	7,935.00

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/03/20	Carson Heninger	Filed fee notices with the court and fixed PDF issue that was preventing filing. Served on all appropriate parties and calendared deadlines.	1.00	0.00
08/20/20	Carson Heninger	Drafted June Fee Notice and finalized for P. Hunt's review. Drafted multiple emails to circulate to appropriate parties.	1.10	0.00
08/21/20	Carson Heninger	Filed fee notice; emailed professionals; emailed assistant instructions.	0.40	0.00
08/27/20	Carson Heninger	Began drafting ninth fee application with accompanying exhibits.	2.30	0.00
08/28/20	Carson Heninger	Revised fee application and compiled	2.10	0.00

Invoice No.: 5483249
 Matter No.: 194096.010100

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Description of Professional Services Rendered

exhibits. Drafted summary of fee and
 expenses for application period.

Total Hours: 6.90

Total Amount: \$ 0.00

Total Fees: 0.00

TASK CODE: TMLS006 INTERNATIONAL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/03/20	Mohammed J. Khamisa	Reading 40page declaration prepared by Ray Strong for the Dist Court summarizing the tasks, methodologies and analysis of the TM data obtained from Paypal and other digital wallets	1.00	925.00
08/04/20	Struan F. Clark	Review of new material provided by BRG	0.50	135.00
08/05/20	Ian Bean	Brief discussion of strategy with Mohammed, plus emails with P. Hunt and J. Wiest re same.	0.30	196.50
08/06/20	Ian Bean	Preparation for and call with Amy Rogers, debrief with Mohammed and email to P. Hunt confirming call.	1.10	720.50
08/06/20	Mohammed J. Khamisa	Telecon with Counsel Ms Amy Rogers to discuss the evidence and the applications for Bankers Trust orders; Norwich Pharmacol Orders for disclosure; pt8 claim ; disclosure application against E-wallets such as paypal etal	0.70	647.50
08/07/20	Ian Bean	Preparation for and attendance on call with P. Hunt and J. Wiest plus debrief with Mohammed and Struan re same.	1.30	851.50
08/07/20	Struan F. Clark	Call and follow up work	0.90	243.00
08/07/20	Struan F. Clark	Collating all documents and creating index ahead of call	1.70	459.00
08/07/20	Mohammed J. Khamisa	Pre-telecon discussion with I. Bean and then telecon with PH/JW	0.50	462.50
08/10/20	Struan F. Clark	Letter of request analysis.	1.60	432.00
08/10/20	Struan F. Clark	Researching and corresponding with investigator for quotes	0.40	108.00
08/11/20	Struan F. Clark	Call with investigator.	0.40	108.00
08/11/20	Struan F. Clark	Aslam summary for Terry Burke	1.30	351.00
08/11/20	Mohammed J. Khamisa	Telecon provide a brief outline of the work needed to trace defendants.	0.50	462.50
08/12/20	Struan F. Clark	Discussing correspondence to investigator with M. Khamisa and sending the same.	0.20	54.00
08/12/20	Struan F. Clark	Call with detectives and providing background re the same	0.80	216.00
08/12/20	Mohammed J. Khamisa	Telecon with investigators to discuss the	0.50	462.50

Invoice No.: 5483249
 Matter No.: 194096.010100

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Description of Professional Services Rendered

		scope of work and providing a verbal narrative of the case.		
08/13/20	Struan F. Clark	Correspondence with J. Wiest and receiver.	0.20	54.00
08/13/20	Struan F. Clark	Liaising with Harod Associates and receiver and J. Wiest re the same.	0.60	162.00
08/14/20	Ian Bean	Discussion with Struan re approach with investigator and Struan providing update to receiver re same.	0.40	262.00
08/17/20	Struan F. Clark	Reviewing Terms and Conditions of investigator proposal.	0.40	108.00
08/17/20	Mohammed J. Khamisa	Reviewing TOBs and Engagement Letter for investigator.	0.50	462.50
08/18/20	Struan F. Clark	Attend to investigator issues.	0.60	162.00
08/19/20	Struan F. Clark	Finalizing engagement and liaising with M. Khamisa and P. Hunt re the same.	1.20	324.00
08/24/20	Ian Bean	Reviewing documents provided by J. Wiest including draft letter of request, preparing mark-up of letter plus discussion with Mohammed re documents to be requested.	1.60	1,048.00
08/24/20	Mohammed J. Khamisa	Reviewing the various drafts sent through on letter of request and reviewing edits by I. Bean and approving.	0.70	647.50
			<hr/>	
			Total Hours:	19.90
			Total Amount:	\$ 10,064.50
			Total Fees:	10,064.50

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Mohammed J. Khamisa	4.40	925.00	4,070.00
Struan F. Clark	10.80	270.00	2,916.00
Sarah Goldberg	23.00	345.00	7,935.00
Carson Heninger	9.20	82.50	759.00
John Wiest	47.20	330.00	15,576.00
Ian Bean	4.70	655.00	3,078.50
Totals:	99.30	345.77	\$ 34,334.50

Invoice No.: 5483249
Re: Receiver for Traffic Monsoon/Legal Services
Matter No.: 194096.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file

EXHIBIT C



Peggy Hunt
Greenberg Traurig, LLP
222 South Main Street, 5th Floor
Salt Lake City, UT 84101

September 24, 2020
Client-Matter: 997-14823
Invoice #: 102436
Tax ID # 27-1451273

Via Email: huntp@gtlaw.com

RE: Traffic Monsoon Receivership

Services Rendered From August 1, 2020 Through August 31, 2020

Professional Services	\$ 14,061.00	USD
Voluntary Reduction	(142.50)	
Expenses Incurred	50.50	
CURRENT CHARGES	\$ 13,969.00	USD

PAYMENT IS DUE BY October 24, 2020

Please direct questions regarding this invoice to: Jeff Shaw at (801) 364-6233 or JShaw@thinkbrg.com.

Please remit payment by check to:
Berkeley Research Group, LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:
Bank Name:
SWIFT:
ABA #:
Account Name:
Account #:
Reference:

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

Page 2 of 6
 Invoice # 102436
 Client-Matter: 00997-014823

Services Rendered From August 1, 2020 Through August 31, 2020

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Paul Shields	345.00	1.10	379.50
Ray Strong	330.00	14.60	4,818.00
Senior Managing Consultant			
Jeffrey Shaw	285.00	30.60	8,721.00
Jeffrey Shaw	0.00	0.50	N/C
Total Professional Services		46.80	13,918.50

EXPENSES

Postage	0.50
Subcontracted Services	50.00
Total Expenses	50.50



To: Peggy Hunt
c/o: Greenberg Traurig, LLP
RE: Traffic Monsoon Receivership

Page 3 of 6
Invoice # 102436
Client-Matter: 00997-014823

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
110.0000	General Accounting Issues	5.30	1,510.50
500.0000	Avoidance Action Analysis	41.00	12,408.00
950.0000	Fee Application Preparation & Hearing	0.50	0.00
Total Professional Services		46.80	13,918.50



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

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 Invoice # 102436
 Client-Matter: 00997-014823

Services Rendered From August 1, 2020 Through August 31, 2020

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 110.0000 - General Accounting Issues					
08/11/20	Jeffrey Shaw	Reviewed and recorded transactions in Trust Works.	1.20	285.00	342.00
08/11/20	Jeffrey Shaw	Follow-up with Receiver regarding outstanding payments.	0.10	285.00	28.50
08/17/20	Jeffrey Shaw	Follow-up with Receiver regarding payment of outstanding amounts.	0.10	285.00	28.50
08/18/20	Jeffrey Shaw	Reviewed current status of outstanding payables.	0.20	285.00	57.00
08/20/20	Jeffrey Shaw	Reviewed and recorded activity in Trust Works.	0.50	285.00	142.50
08/20/20	Jeffrey Shaw	Reviewed and compiled support for wire payments.	0.40	285.00	114.00
08/20/20	Jeffrey Shaw	Reviewed and prepared supporting documents for payments.	0.70	285.00	199.50
08/20/20	Jeffrey Shaw	Reviewed, prepared and coordinated payment of outstanding payables.	2.10	285.00	598.50
Total for Task Code 110.0000			5.30		1,510.50
Task Code: 500.0000 - Avoidance Action Analysis					
08/05/20	Jeffrey Shaw	Reviewed files and schedules related to payment processor activity and submitted requested items to counsel.	1.50	285.00	427.50
08/05/20	Jeffrey Shaw	Reviewed and responded to emails regarding default judgments and payment processors.	0.20	285.00	57.00
08/06/20	Jeffrey Shaw	Call with Receiver regarding re analysis to be completed on default judgment for avoidance actions.	0.30	285.00	85.50
08/06/20	Ray Strong	Discussed default judgment issues and declaration to be prepared with Receiver.	0.30	330.00	99.00
08/10/20	Jeffrey Shaw	Discussion regarding prejudgment interest calculation.	0.20	285.00	57.00
08/10/20	Jeffrey Shaw	Reviewed ruling and prepared prejudgment interest calculations.	1.90	285.00	541.50



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

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 Invoice # 102436
 Client-Matter: 00997-014823

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/10/20	Paul Shields	Reviewed and discussed pre-judgment interest issues.	0.50	345.00	172.50
08/11/20	Jeffrey Shaw	Reviewed and discussed prejudgment interest calculation for default judgments.	0.40	285.00	114.00
08/11/20	Jeffrey Shaw	Prepared schedules for prejudgment interest calculation.	4.00	285.00	1,140.00
08/11/20	Paul Shields	Discussion regarding prejudgment interest calculation. Identified and remitted information regarding prejudgment interest rates.	0.30	345.00	103.50
08/11/20	Ray Strong	Analyzed pre-judgment interest issues for default judgments.	1.50	330.00	495.00
08/12/20	Jeffrey Shaw	Reviewed and prepared schedules for prejudgment interest calculation.	4.20	285.00	1,197.00
08/12/20	Ray Strong	Analyzed pre-judgment interest issues for default judgments.	1.30	330.00	429.00
08/13/20	Jeffrey Shaw	Reviewed and updated prejudgment interest calculation schedules.	1.50	285.00	427.50
08/13/20	Jeffrey Shaw	Discussion regarding prejudgment interest calculation.	0.30	285.00	85.50
08/13/20	Paul Shields	Reviewed issues associated with prejudgment interest calculation.	0.30	345.00	103.50
08/13/20	Ray Strong	Discussed pre-judgment interest analysis for Barker and Gantz with staff.	0.20	330.00	66.00
08/14/20	Jeffrey Shaw	Reviewed and updated prejudgment interest calculation schedules.	1.20	285.00	342.00
08/18/20	Jeffrey Shaw	Reviewed and updated prejudgment interest calculation schedules.	5.10	285.00	1,453.50
08/18/20	Jeffrey Shaw	Discussion regarding prejudgment interest calculation and schedules.	0.50	285.00	142.50
08/18/20	Ray Strong	Discussed Ganz and Barker net winner analysis and calculation of prejudgment interest with team.	0.50	330.00	165.00
08/18/20	Ray Strong	Analyzed and prepared draft Barker and Ganz declaration.	0.30	330.00	99.00
08/18/20	Ray Strong	Analyzed draft Ganz and Barker analysis for declaration.	0.30	330.00	99.00



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

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 Invoice # 102436
 Client-Matter: 00997-014823

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/19/20	Jeffrey Shaw	Reviewed and updated prejudgment interest calculation schedules and declaration narrative.	3.50	285.00	997.50
08/19/20	Ray Strong	Analyzed and prepared Barker declaration and supporting schedules to be filed with the court.	4.40	330.00	1,452.00
08/20/20	Jeffrey Shaw	Reviewed draft default judgment declaration.	0.20	285.00	57.00
08/20/20	Ray Strong	Discussed Ganz and Barker declaration issues with Receiver.	0.20	330.00	66.00
08/20/20	Ray Strong	Analyzed and finalized Ganz declaration and supporting schedules to be filed with the court.	2.80	330.00	924.00
08/20/20	Ray Strong	Analyzed and finalized Barker declaration and supporting schedules to be filed with the court.	2.80	330.00	924.00
08/21/20	Jeffrey Shaw	Reviewed default judgment declarations and exhibits.	0.30	285.00	85.50
Total for Task Code 500.0000			41.00		12,408.00
Task Code: 950.0000 - Fee Application Preparation & Hearing					
08/20/20	Jeffrey Shaw	Reviewed June 2020 fee notice.	0.50	0.00	N/C
Total for Task Code 950.0000			0.50		0.00
Professional Services			46.80		13,918.50

DETAIL OF EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/31/20	BRG Misc Clearing - BRG Misc Clearing 08/31/2020 Traffic Monsoon Postage Timekeeper : 09999 - Applicable, Not Invoice #: 083120a Vchr Comment: Salt Lake City Postage August 2020	0.50
08/31/20	Strong Connexions, Inc. - Subcontracted Services- Monthly Back up Server Invoice #: 6854 Vchr Comment: Services of Jason Strong on Matter #14823 in August 2020. Timekeeper : 03021 - Strong, Jason	50.00
Expenses		50.50

EXHIBIT 4

Peggy Hunt (Utah #6060)
Sarah Goldberg (Utah #13222)
John J. Wiest (Utah #15767)
GREENBERG TRAUIG, LLP
222 South Main Street, 5th Floor
Salt Lake City, UT 84101
Telephone: (801) 478-6900
huntp@gtlaw.com
goldbergsa@gtlaw.com
wiestj@gtlaw.com

Attorneys for Court-Appointed Receiver Peggy Hunt

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

TRAFFIC MONSOON, LLC, a Utah limited
liability company, and CHARLES DAVID
SCOVILLE, an individual,

Defendants.

**NOTICE OF REQUEST FOR PAYMENT
BY RECEIVER AND RECEIVER'S
PROFESSIONALS**

**(SEPTEMBER 1, 2020, THROUGH
SEPTEMBER 30, 2020)**

2:16-cv-00832-JNP

The Honorable Jill N. Parrish

Pursuant to the *Order Establishing Administrative Expense Payment Procedures* entered by the Court on June 13, 2017,¹ Peggy Hunt, the Court-appointed receiver in the above-captioned case (the “Receiver”), hereby submits the following *Notice of Request for Payment by Receiver and Receiver’s Professionals* related to fees and expenses incurred during the period of September 1, 2020, through September 30, 2020 (the “Notice”). The fees and expenses detailed

¹ Docket No. [101](#).

in this Notice have been reviewed and approved, subject to Court approval, by the Receiver. This Notice was served on the Securities and Exchange Commission on November 4, 2020, and the Commission has informed the Receiver it does not oppose this request.

<u>Name of Applicant</u>	Receiver
Total Hours of Service	14.70
Total Fees for Time Period	\$ 4,372.65²
Total Expenses for Time Period	\$ 0.00
Total	\$ 4,372.65
Total Interim Payment Requested: (80% of Fees and 100% of Expenses)	\$ 3,498.12
Remaining Balance:	\$ 874.53
Time and Services Detail:	Exhibit A

<u>Name of Applicant</u>	Greenberg Traurig, LLP
Total Hours of Service	29.50
Total Fees for Time Period	\$ 8,797.00³
Total Expenses for Time Period	\$ 145.03
Total	\$ 8,942.03
Total Interim Payment Requested: (80% of Fees and 100% of Expenses)	\$ 7,182.63
Remaining Balance:	\$ 1,759.40
Time and Services Detail:	Exhibit B

² Incurred fees totaling \$5,225.85, less a voluntary reduction of fees in the amount of \$853.20.

³ Incurred fees totaling \$10,810.00, less a voluntary reduction of fees in the amount of \$2,013.00.

<u>Name of Applicant</u>	Berkeley Research Group
Total Hours of Service	12.70
Total Fees for Time Period	\$ 2,050.50⁴
Total Expenses for Time Period	\$ 50.00
Total	\$ 2,100.50
Total Interim Payment Requested: (80% of Fees and 100% of Expenses)	\$ 1,690.40
Remaining Balance:	\$ 410.10
Time and Services Detail:	Exhibit C

[Signature Page Follows]

⁴ Incurred fees totaling \$3,646.50, less a voluntary reduction of fees in the amount of \$1,596.00.

DATED November 10, 2020.

RECEIVER

/s/ Peggy Hunt

Peggy Hunt

GREENBERG TRAURIG, LLP

/s/ Sarah Goldberg

Sarah Goldberg

Counsel for Receiver

BERKELEY RESEARCH GROUP

/s/ Marvin Tenenbaum

Marvin Tenenbaum

Senior Vice President & Special Advisor to
the Chairman

Accountants for Receiver

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record in this case.

I further certify that on November 10, 2020, I caused the foregoing to be served:

Via Email:

The SEC

Casey Fronk
Daniel J. Wadley
Amy J. Oliver
Cheryl M. Mori
fronkc@sec.gov
waldleyd@sec.gov
olivera@sec.gov
moric@sec.gov

BRG

Matt K. Babcock
Jeff Shaw
Ray Strong
mbabcock@thinkbrg.com
JShaw@thinkbrg.com
rstrong@thinkbrg.com

/s/ Carson Heninger

EXHIBIT A

Peggy Hunt- Receiver for Traffic Monsoon/Receiver Services
Services Rendered September 1, 2020 to September 30, 2020

Task Code	Task Description	Hours	Fees
TMLS-TMLS001	Administration	8.50	\$ 3,021.75
TMLS-TMLS002	Asset Recovery	0.8	\$ 284.40
TMLS-TMLS003	Claims Administration	3.0	\$ 1,066.50
TMLS-TMLS004	Fee Issues	2.4	\$ 853.00
TMLS-TMLS005	Plan of Distribution	0.0	\$ -
TMLS-TMLS006	International	0.0	\$ -
	Total Fees	14.70	\$ 5,225.65
TMLS-TMLS007	Out-of-Pocket Expenses		-
	Invoice Total		

Write Off	Requested Fees
\$ -	\$ 3,021.75
\$ -	\$ 284.40
\$ -	\$ 1,066.50
\$ (853.00)	\$ -
	\$ -
\$ -	\$ -
\$ (853.00)	\$ 4,372.65
	\$ -
	\$ 4,372.65



Invoice No. : 5512589
File No. : 194098.010100
Bill Date : October 31, 2020

Peggy Hunt
222 S. Main Street, 5th Floor
Salt Lake City, UT 84101

INVOICE

Re: Receiver for Traffic Monsoon / Receiver Services

Legal Services through September 30, 2020:

	\$	5,225.85
Less Courtesy Discount:	\$	(853.20)
Total Fees:	\$	4,372.65

Current Invoice: \$ 4,372.65

Invoice No.: 5512589
 Matter No.: 194098.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/18/20	Peggy Hunt	Call with Stretto re banking issues	0.20	71.10
09/21/20	Peggy Hunt	Review website and correspondence re updates necessary for same; obtain information and provide to Epiq (.5); finish draft of ninth status report, including review of files on certain issues and follow up emails on status of items (2.5)	3.00	1,066.50
09/22/20	Peggy Hunt	Attend to numerous administrative tasks including investor communications and banking (.5); finalize status report and instructions to staff on same (.5); correspondence with S. Goldberg re numerous tasks (.1); review Epiq bill, conference with Epiq re same and re updates to website (.4); review S. Goldberg's comments on status report and incorporate same and email to staff re finalizing same for filing (.3); correspondence with J. Shaw re Epiq bill (.1)	1.90	675.45
09/23/20	Peggy Hunt	Finalize SFAR and correspondence with staff re final revisions to status report; final review of status report and correspondence with staff re filing same; correspondence re numerous tasks (.7); review website changes, and correspondence with Epiq re further changes that need to be made (.5)	1.20	426.60
09/24/20	Peggy Hunt	Correspondence re numerous tasks, including Epiq billings; meeting with J. Shaw and update on status	0.50	177.75
09/25/20	Peggy Hunt	Review changes to website, compile further changes and correspondence with Epiq re same (.5); review bank issues and email with B. Soper re interest rate (.1); conference with Epiq re cost of storage (.1)	0.70	248.85
09/28/20	Peggy Hunt	Attend to estate administration issues	0.50	177.75
09/29/20	Peggy Hunt	Attend to administrative issues	0.20	71.10
09/30/20	Peggy Hunt	Call with B. Soper re bank accounts and interest rates	0.30	106.65

Total Hours: 8.50

Total Amount: \$ 3,021.75
 Total Fees: 3,021.75

Invoice No.: 5512589
 Matter No.: 194098.010100

Page 2

Description of Professional Services Rendered

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/20	Peggy Hunt	Correspondence with J. Wiest re letter requests; review documents on same	0.30	106.65
09/16/20	Peggy Hunt	Analysis of report on target defendants	0.30	106.65
09/22/20	Peggy Hunt	Correspondence re letter of request	0.10	35.55
09/23/20	Peggy Hunt	Correspondence re letter of request	0.10	35.55
Total Hours:			0.80	
			Total Amount:	\$ 284.40
			Total Fees:	284.40

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/21/20	Peggy Hunt	Correspondence with Epiq re status of claims reports	0.10	35.55
09/22/20	Peggy Hunt	Call with Epiq re claims reports and issues; correspondence re same	0.40	142.20
09/23/20	Peggy Hunt	Correspondence with S. Goldberg re claim procedure issues	0.60	213.30
09/24/20	Peggy Hunt	Analysis of claim objection issues and conference with Epiq and S. Goldberg re same	0.80	284.40
09/24/20	Peggy Hunt	Review Epiq updated claims report and continued analysis of objection issues	0.50	177.75
09/25/20	Peggy Hunt	Call with Epiq on claims issues, and follow up with S. Goldberg	0.40	142.20
09/29/20	Peggy Hunt	Call with Epiq on claim objection issues	0.20	71.10
Total Hours:			3.00	
			Total Amount:	\$ 1,066.50
			Total Fees:	1,066.50

Invoice No.: 5512589
 Matter No.: 194098.010100

Page 3

Description of Professional Services Rendered

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/22/20	Peggy Hunt	Review and revise ninth fee application and correspondence with C. Heninger re same	2.00	0.00
09/23/20	Peggy Hunt	Correspondence with J. Shaw re fee application and fee payments; correspondence with A. Olver re fee application; correspondence with C. Heninger re order	0.40	0.00
			<hr/>	
			Total Hours:	2.40
			Total Amount:	\$ 0.00
			Total Fees:	0.00

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Peggy Hunt	12.30	355.50	4,372.65
Peggy Hunt	2.40	355.50	0.00
Totals:	14.70	297.46	\$ 4,372.65

Invoice No.: 5512589
Re: Receiver for Traffic Monsoon / Receiver Services
Matter No.: 194098.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file

EXHIBIT B

Peggy Hunt- Receiver for Traffic Monsoon/Legal Services
Services Rendered September 1, 2020 to September 30, 2020

Task Code	Task Description	Hours	Fees	Write Off	Requested Fees
TMLS-TMLS001	Administration	1.20	\$ 414.00	\$ -	\$ 414.00
TMLS-TMLS002	Asset Recovery	12.6	4,158.00	-	\$ 4,158.00
TMLS-TMLS003	Claims Administration	5.9	2,035.50	-	\$ 2,035.50
TMLS-TMLS004	Fee Issues	6.1	\$ 2,013.00	(2,013.00)	\$ -
TMLS-TMLS005	Plan of Distribution	0.0	\$ -		\$ -
TMLS-TMLS006	International	3.7	\$ 2,189.50		\$ 2,189.50
	Total Fees	29.50	\$ 10,810.00	\$ (2,013.00)	\$ 8,797.00
TMLS-TMLS007	Out-of-Pocket Expenses		\$ 145.03		\$ 145.03
	Invoice Total				\$ 8,942.03



Invoice No. : 5515788
 File No. : 194096.010100
 Bill Date : October 31, 2020

Peggy Hunt
 222 S. Main Street, 5th Floor
 Salt Lake City, UT 84101

INVOICE

Re: Receiver for Traffic Monsoon/Legal Services

Internal- reserve;flip

	\$	10,810.00
Less Courtesy Discount:	\$	(2,013.00)
Total Fees:	\$	8,797.00

Expenses:

UPS Charges	103.63	
Information and Research	41.40	
Total Expenses:	\$	145.03
Current Invoice:	\$	8,942.03

Invoice No.: 5515788
 Matter No.: 194096.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: TMLS001 ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/22/20	Sarah Goldberg	Review and comment on status report	1.20	414.00
Total Hours:			1.20	
Total Amount:				\$ 414.00
Total Fees:				414.00

TASK CODE: TMLS002 ASSET RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/04/20	John Wiest	Review and revise motion for letter of request and related exhibits (1); analyze Payza and Allied Wallet user agreements with TM and possible clawback actions (2.8)	3.80	1,254.00
09/10/20	Carson Heninger	Reviewed filed motion to issue letter of request	0.20	66.00
09/10/20	John Wiest	Revise motion for letter request (1.1); review analysis of Payza and Allied Wallet fees and phone conference with J. Shaw re same (1.5)	2.60	858.00
09/17/20	Carson Heninger	Research re payment processors demands	2.50	825.00
09/17/20	John Wiest	Review prior correspondence with Allied Wallet and correspondence with C. Heninger re demand letter (.5)	0.50	165.00
09/22/20	Carson Heninger	Reserach re payment processors.	0.30	99.00
09/25/20	Carson Heninger	Research re payment processors	0.90	297.00
09/28/20	John Wiest	Review signed letter of request and correspondence with London colleagues re (.7); correspondence with C. Heninger re demand letters to payment processors (.2)	0.90	297.00
09/30/20	Carson Heninger	Research re payment processors	0.90	297.00
Total Hours:			12.60	
Total Amount:				\$ 4,158.00
Total Fees:				4,158.00

Invoice No.: 5515788
 Matter No.: 194096.010100

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Description of Professional Services Rendered

TASK CODE: TMLS003 CLAIMS ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/20	Sarah Goldberg	Correspondences with B. Gallerie regarding evidence submitted in support of claims	0.40	138.00
09/17/20	Sarah Goldberg	Review exhibits for omnibus objections prepared by Epiq (.5); revise claim objection motion (.5); prepare summary of outstanding issues for Receiver (.7)	1.70	586.50
09/23/20	Sarah Goldberg	Call with Receiver re claims process (.6); review claims issues (.5)	1.10	379.50
09/24/20	Sarah Goldberg	Review issues regarding claims procedure (1); call with Epiq regarding claims issues	1.40	483.00
09/29/20	Sarah Goldberg	Call with Epiq regarding claims issues and preparation for same	0.30	103.50
09/30/20	Sarah Goldberg	Revise claim motion with new information from Epiq	1.00	345.00
Total Hours:			5.90	
			Total Amount:	\$ 2,035.50
			Total Fees:	2,035.50

TASK CODE: TMLS004 FEE ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/20	Carson Heninger	Completed Fee App and exhibits. Emailed to P. Hunt for review.	0.90	0.00
09/23/20	Carson Heninger	Reviewed changes to 9th Fee App., made revisions, emailed professionals for approval. Reviewed objection deadline and other requests from Receiver regarding fee notices.	2.30	0.00
09/24/20	Carson Heninger	Reviewed and filed fee app and proposed order. Trouble shot issues with court system accepting pdf.	0.90	0.00
09/24/20	Carson Heninger	Drafted proposed order.	0.60	0.00
09/30/20	Carson Heninger	Reviewed invoices and began preparing fee notices. Emailed parties for updated invoices.	1.40	0.00
Total Hours:			6.10	
			Total Amount:	\$ 0.00
			Total Fees:	0.00

Invoice No.: 5515788
 Matter No.: 194096.010100

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Description of Professional Services Rendered

TASK CODE: TMLS006 INTERNATIONAL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/11/20	Struan F. Clark	Reviewing material and laising with Harod Associates, IB, MK and John/Peggy re the same	0.70	189.00
09/11/20	Mohammed J. Khamisa	Reviewing draft report from Harod Associatesre tracing. Brief discussion with team.	0.70	647.50
09/21/20	Ian Bean	Discussion with Mohammed and email to John for update.	0.20	131.00
09/21/20	Struan F. Clark	Update call with Martin Dubbey	0.30	81.00
09/21/20	Mohammed J. Khamisa	Telecon with Martin Dubbey of Harod Associates to get an update of the tracing efforts ; Several leads and a property identified with next step	0.30	277.50
09/30/20	Struan F. Clark	Analysis of Harod report and emails to GT US	0.50	135.00
09/30/20	Struan F. Clark	Reviewing HA docs	0.30	81.00
09/30/20	Mohammed J. Khamisa	Reading the report from Harod GIS into tracing , the proposed Phase 2 work and estimate and attachments.	0.70	647.50
Total Hours:			3.70	
Total Amount:				\$ 2,189.50
Total Fees:				2,189.50

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Mohammed J. Khamisa	1.70	925.00	1,572.50
Struan F. Clark	1.80	270.00	486.00
Sarah Goldberg	7.10	345.00	2,449.50
Carson Heninger	4.80	330.00	1,584.00
Carson Heninger	6.10	330.00	0.00
John Wiest	7.80	330.00	2,574.00
Ian Bean	0.20	655.00	131.00
Totals:	29.50	298.20	\$ 8,797.00

Invoice No.: 5515788
 Re: Receiver for Traffic Monsoon/Legal Services
 Matter No.: 194096.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
07/08/20	Search Criteria: (None); Document Type: Pacer Research Charges for July 2020	\$ 0.50
07/13/20	Search Criteria: (None); Document Type: Pacer Research Charges for July 2020	\$ 2.00
07/14/20	Search Criteria: (None); Document Type: Pacer Research Charges for July 2020	\$ 14.00
07/16/20	Search Criteria: (None); Document Type: Pacer Research Charges for July 2020	\$ 3.50
07/17/20	Search Criteria: (None); Document Type: Pacer Research Charges for July 2020	\$ 8.00
07/22/20	Search Criteria: (None); Document Type: Pacer Research Charges for July 2020	\$ 4.60
07/30/20	Search Criteria: (None); Document Type: Pacer Research Charges for July 2020	\$ 8.80
09/29/20	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00100320240 DATE: 10/3/2020 Trk'ing No. 1Z451W695495529370 / Worldwide Express from Greenberg Traurig Llp Gtslclong to Greenberg Traurig Llp Mohammed Khamisa Q.C on 9/29/2020 - 194096.010100	\$ 103.63
Total Expenses:		\$ 145.03

EXHIBIT C



Peggy Hunt
Greenberg Traurig, LLP
222 South Main Street, 5th Floor
Salt Lake City, UT 84101

October 28, 2020
Client-Matter: 997-14823
Invoice #: 104007
Tax ID # 27-1451273

Via Email: huntp@gtlaw.com

RE: Traffic Monsoon Receivership

Services Rendered From September 1, 2020 Through September 30, 2020

Professional Services	\$ 3,646.50	USD
Voluntary Reduction	(1,596.00)	
Expenses Incurred	50.00	
CURRENT CHARGES	\$ 2,100.50	USD

PAYMENT IS DUE BY November 27, 2020

Please direct questions regarding this invoice to: Jeff Shaw at (801) 364-6233 or JShaw@thinkbrg.com.

Please remit payment by check to:
Berkeley Research Group, LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:
Bank Name:
SWIFT:
ABA #:
Account Name:
Account #:
Reference:

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

Page 2 of 5
 Invoice # 104007
 Client-Matter: 00997-014823

Services Rendered From September 1, 2020 Through September 30, 2020

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Ray Strong	330.00	0.60	198.00
Senior Managing Consultant			
Jeffrey Shaw	285.00	6.50	1,852.50
Jeffrey Shaw	0.00	5.60	N/C
Total Professional Services		12.70	2,050.50

EXPENSES

Subcontracted Services			50.00
Total Expenses			50.00



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

Page 3 of 5
 Invoice # 104007
 Client-Matter: 00997-014823

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
110.0000	General Accounting Issues	2.20	627.00
120.0000	Monthly Operating Report Preparation	0.30	85.50
310.0000	Claims Analysis - Net Winner / Net Loser	2.50	739.50
500.0000	Avoidance Action Analysis	2.10	598.50
950.0000	Fee Application Preparation & Hearing	5.60	0.00
Total Professional Services		12.70	2,050.50



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

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 Invoice # 104007
 Client-Matter: 00997-014823

Services Rendered From September 1, 2020 Through September 30, 2020

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 110.0000 - General Accounting Issues					
09/23/20	Jeffrey Shaw	Reviewed status of outstanding payables and emails with Receiver regarding the same.	0.40	285.00	114.00
09/24/20	Jeffrey Shaw	Reviewed and prepared outstanding payables.	0.50	285.00	142.50
09/24/20	Jeffrey Shaw	Coordinated payment of outstanding payables.	0.40	285.00	114.00
09/29/20	Jeffrey Shaw	Reviewed and prepared support for payables.	0.20	285.00	57.00
09/30/20	Jeffrey Shaw	Reviewed, prepared and coordinated payment of outstanding payables.	0.70	285.00	199.50
Total for Task Code 110.0000			2.20		627.00
Task Code: 120.0000 - Monthly Operating Report Preparation					
09/21/20	Jeffrey Shaw	Reviewed and submitted Q2 quarterly report to Receiver.	0.30	285.00	85.50
Total for Task Code 120.0000			0.30		85.50
Task Code: 310.0000 - Claims Analysis - Net Winner / Net Loser					
09/04/20	Jeffrey Shaw	Reviewed TM investor files and reported findings pursuant to counsel inquiry.	1.90	285.00	541.50
09/09/20	Ray Strong	Analyzed TM database for email addresses and name inquiries from counsel.	0.60	330.00	198.00
Total for Task Code 310.0000			2.50		739.50
Task Code: 500.0000 - Avoidance Action Analysis					
09/10/20	Jeffrey Shaw	Reviewed Payza transaction activity and fee data to verify amounts and reported findings to counsel.	1.60	285.00	456.00
09/10/20	Jeffrey Shaw	Call with counsel regarding Payza and Allied Wallet activity and fees.	0.50	285.00	142.50
Total for Task Code 500.0000			2.10		598.50



To: Peggy Hunt
 c/o: Greenberg Traurig, LLP
 RE: Traffic Monsoon Receivership

Page 5 of 5
 Invoice # 104007
 Client-Matter: 00997-014823

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 950.0000 - Fee Application Preparation & Hearing					
09/11/20	Jeffrey Shaw	Follow-up regarding status of fee application and monthly billings.	0.20	0.00	N/C
09/23/20	Jeffrey Shaw	Emails with Receiver regarding fee application and other outstanding items.	0.40	0.00	N/C
09/23/20	Jeffrey Shaw	Reviewed and updated schedules for Q2 fee application.	2.80	0.00	N/C
09/24/20	Jeffrey Shaw	Reviewed time entries and descriptions for Aug bill.	0.40	0.00	N/C
09/24/20	Jeffrey Shaw	Reviewed fee application order and emails regarding the same.	0.40	0.00	N/C
09/24/20	Jeffrey Shaw	Reviewed time entries and descriptions for Jul bill.	0.40	0.00	N/C
09/28/20	Jeffrey Shaw	Reviewed, finalized and submitted Jul bill.	0.50	0.00	N/C
09/28/20	Jeffrey Shaw	Reviewed, finalized and submitted Aug bill.	0.50	0.00	N/C
Total for Task Code 950.0000			5.60		0.00
Professional Services			12.70		2,050.50

DETAIL OF EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/30/20	Strong Connexions, Inc. - Subcontracted Services- Backup server Invoice #: 7060 Vchr Comment: Services on Matter #14823 in September 2020. Timekeeper : 03021 - Strong, Jason	50.00
Expenses		50.00